

## Summary of State ESEA Flexibility Request

### STATE: Colorado

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

Colorado has taken significant legislative actions consistent with a unified vision for student improvement, and those legislative actions serve as the bedrock of its waiver request. Through legislation, Colorado has created accountability and educator evaluation systems that are based on college and career-readiness, focused on driving student growth, based on the use of data to support continuous improvement, and focused on ensuring consequences (positive and negative) based on student outcomes. The request summarizes this vision at the outset, and the consistent themes are returned to throughout the application. Colorado's approach represents a relatively significant departure from Adequate Yearly Progress (AYP), and seeks to replace AYP-like determinations with a more ambitious, state-driven college and career-readiness accountability system.

2. How does the state **define college and career-readiness**? [See Overview; full request]

Colorado has a definition of postsecondary and workforce readiness that includes the knowledge, skills, and behaviors essential for success in college and the workforce. The definition begins: "Postsecondary and workforce readiness describes the knowledge, skills, and behaviors essential for high school graduates to be prepared to enter college and the workforce and to compete in the global economy." (p. 288) It then itemizes knowledge and skills that students should be expected to demonstrate, organized by areas of content knowledge (literacy, mathematical sciences, science, social studies and social sciences, and the arts and humanities) and "Learning and Behavior Skills (critical thinking and problem solving, find and use information/information technology, creativity and innovation, global and cultural awareness, civic responsibility, work ethic, personal responsibility, communication, and collaboration). (p. 288-289) This definition was developed through a collaborative process between the Colorado Department of

Education and the Colorado Department of Higher Education, involving regional meetings and feedback from more than 1,000 stakeholders. (p. 9)

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

Colorado's request shows a strong commitment to evaluation and continuous improvement in all policy areas. In particular, Colorado's plan for implementing CCSS identifies "continuously refining teaching and learning" as an ongoing process that must be part of the state's commitment to implementation. In addition, the state identifies other places where state policy is meant to drive continuous improvement:

- Colorado's plan for transition to new standards explicitly includes a commitment to continuously refining teaching and learning. (p. 25)
- Colorado's accountability system is designed to support continuous improvement, particularly in the lowest performing schools. (p. 113)
- Colorado's teacher evaluation system is meant to give teachers the feedback and supports they need to continuously improve their practice. (p. 118)

The request's narrative regarding continuous improvement tends to focus more on practitioners and less on the need to continuously update and improve state policy.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Colorado's description of its supports for districts and schools describes a Tiered System of Supports that draws significantly on Colorado Department of Education capacity. (p. 105-116) While the state does not specifically discuss its capacity and how that affects its ability to execute its plans, it have in place some significant infrastructure for supporting districts and schools, perhaps most notably the SchoolView data system. (p. 52-57) Colorado has a partnership with the Colorado Legacy Foundation which helps provide the Colorado Department of Education with additional capacity on significant initiatives. (p. 120)

**Principle 1: Standards and Assessments. This section addresses the nature and extent of the state's proposed plan to implement college and career-ready standards and assessments over the next several years.**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

Colorado has planned for a multi-year transition to new standards and assessments, with a significant focus on ensuring that teachers are able to teach the new standards. The state is currently in year two of a four-year plan to implement the standards. Year one focused on awareness; year two focuses on transition; year three will focus on full implementation; and years four and onward will focus on transformation, the ongoing process of continuous improvement.

Colorado has conducted a gap analysis comparing its new standards to the state's previous standards, and used those as the basis for its transition plans. The Colorado Department of Education (CDE) has established a Standards Implementation Team that includes representatives from different areas of the agency, notably the Exceptional Student Service Unit (to ensure that expectations for students with disabilities are maintained at a high level). (p. 24) District and school leaders have been provided with a Transition Overview by CDE to help guide their implementation. (p. 24-25) Districts and expected to use the current school year to design a standards-based curriculum, and then begin using that curriculum in 2012-13. (p. 24) New content collaboratives are being developed to support the creation and dissemination of standards-based assessment and instructional materials. (p. 32)

Colorado has several efforts focused on teacher preparation, licensure, and professional development. These include:

- Professional development opportunities focused on and aligned to the new standards. Colorado is participating in the Strategic Learning Initiative to provide instructional and assessment tools for teachers. (p. 28)
- Educator preparation programs will be required to train students in the use of the new standards. (p. 28)
- In addition, Colorado is partnering with the New Teacher Project to develop an effectiveness-based system for licensure, induction, and preparation aligned to the new standards. (p. 29)

Colorado is participating in an alignment grant to use aligned assessments to determine postsecondary placement. Colorado will also expand access to postsecondary coursework for students still in high school. (p. 30)

Colorado is pursuing multiple avenues to identify rigorous and aligned assessments; it is undertaking local assessment development and participating in both assessment consortia. (p. 33) Its high school assessment includes the ACT. (p. 35)

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Colorado will make annual accountability determinations for all schools and districts based on student status and growth toward college and career-readiness, including a primary focus on growth on state assessments. The measures are tied to the state's definition of college and career-readiness, which builds on CCSS to articulate knowledge and skills needed to be successful beyond high school. Colorado uses three interrelated measures for accountability at the elementary and middle school level focused on assessment results (both raw achievement and growth), and adds a fourth at the high school level focused on college and career-readiness.

- All schools are measured on Achievement (based on assessment results), Growth (based on assessment results), and Growth Gaps (based on assessment results for disaggregated groups). High schools are also measured on Postsecondary and Workforce Readiness (based on graduation rate, subgroup graduation rate, dropout rate, and composite ACT score). (p. 49)
- The percentage score allocations at the elementary level are Achievement 25%, Growth 50%, and Growth Gaps 25%; at the high school level, Achievement 15%, Growth 35%, Growth Gaps 15%, and Postsecondary and Workforce Readiness 35%. (p. 49)

Colorado sets AMOs for all students, based on its Growth to Standard measure. (p. 67) These results are then aggregated at the school, district, and state level. (p. 68) State expectations in Academic Achievement are based on proficiency percentile. (p. 73) Academic Growth to Standard is based on median student growth percentile, considering both normative growth and adequate growth to standard. (p. 74) Median student growth and median adequate student growth for historically disadvantaged groups is the driver of the AMOs for Academic Growth Gaps. (p. 76-77) Postsecondary and Workforce Readiness AMOs are based on graduation rates, dropout rates, and ACT scores. (p. 78) "Overall, the AMOs are meant to strike a balance between being ambitious and being attainable, and are meant to reflect an aggregate of student-level performance such that improvements at the school- and district-level mean improvements for each individual student." (p. 80)

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

Student growth is a significant focus of Colorado's accountability system. Colorado's accountability system includes Academic Growth to Standard (normative and criterion referenced growth). (p. 43) This measure tracks how each student is progressing toward college and career-readiness, which creates a higher expectation of growth for students who are further behind. (p. 47) The system sets goals referred to as adequate growth percentiles, which let districts and schools know how much progress should be expected from each student to get them on track academically. (p. 45) This creates explicit pressure to increase growth most rapidly for historically underperforming students. (p. 47) In addition, Colorado holds districts and schools accountable for their Growth Gaps, to ensure that all populations of students are experiencing academic growth.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

Colorado's accountability system includes a Growth Gaps element that focuses specifically on closing the achievement gap. Growth Gaps for historically disadvantaged students are a core part of the state's accountability system, so schools are accountable for ensuring that all subgroups perform well. (p. 49, 81) Colorado will continue to disaggregate into subgroups for accountability purposes, although it collapses the different minority categories into a single "minority" category and adds a category for catch-up students. (p. 44) This change is part of a larger effort to create consolidated subgroups to increase the "n" size of each and reduce the number of students left out of accountability calculations. Its AMOs do not vary by subgroup (p. 81), but the nature of its "growth to standard" accountability means that some subgroups will need to make greater progress than others to be counted as succeeding. In addition, data is disaggregated to show gaps including minority status, poverty, disability, and limited English proficiency. (p. 40) Colorado also has special procedures for calculating accountability for English Language Learners -- who comprise 13.28% of the state's K-12 population -- based on an English language assessment. (p. 60)

4. Describe the state's general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

Colorado's accountability system contemplates a differentiated system of supports matched to individual districts and schools based on a uniform planning process, which is meant to facilitate diagnostic review and then actions based on the diagnosis.

All schools and districts are required to analyze and respond to their data through a Unified Improvement Plan process, with tiered supports then provided based on the plans. (p. 41, 103) The process consolidates several federal and state reporting requirements, with a common template that districts and schools can adapt to meet their needs. (p. 103) It is meant to focus districts and schools on their particular performance challenges, and make improvement planning more of a continuous improvement process. Data analysis, target setting, and action planning are the key building blocks of the UIP system. (p. 104)

Depending on school performance, schools must prepare a Performance Plan, Improvement Plan, Priority Improvement Plan, or Turnaround Plan. (p. 47, 106) Turnaround plans for the state's Priority Schools flow from the Unified Improvement Plan process, which for Priority Schools includes submitting plans to CDE for review. (p. 90) A state panel evaluates the quality of the plan and the ability of the district to execute it. (p. 91) The options for school improvement are generally consistent with principles that have been consistently articulated by USED, with some state support for districts and schools to undertake the planning and implementation process. Colorado is maintaining public school choice and supplemental educational services (SES) in its accountability plans. (p. 92)

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

Colorado identifies strategies for turnaround consistent with and building on principles articulated by USED, with differentiated supports based on the results of district and school diagnostic reviews.

Colorado's state accountability law provides options for research-based strategies to be utilized in turnaround schools, including the use of a lead partner, reorganizing, seeking recognition as an innovation school, using a school management organization, converting to a charter school (or changing the nature of the charter for a current charter school), or some other similarly dramatic option. (p. 94-95) Consequences for

failing to make adequate progress generally include the replacement of the management. (p. 95) A similar progression is used for districts. (p. 96) Ultimately, sanctions can include the loss of accreditation. (p. 97)

Colorado has a Tiered System of Supports that is meant to provide supports tied to school needs. (p. 105-108) Comprehensive appraisals and the state's school support team help support the work at the local level. (p. 108) Colorado provides some grants to support the turnaround and diagnostic review processes. (p. 109-112)

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

Colorado plans to use a performance management system to increase school and district capacity and provide analysis and supports to LEAs. (p. 113) An improvement manager at CDE works with the districts and schools, and those districts' data are regularly analyzed by CDE. (p. 114) Colorado's system consistently analyzes performance to help further continuous improvement, with real accountability for results. (p. 115-116)

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

Colorado adopted transformational teacher effectiveness legislation in 2010. (p. 118) The new law is meant to provide a basis for continuous improvement, support the use of evaluation results for key personnel decisions, and ensure evaluation is based in significant part on student growth. (p. 118) Since then, Colorado has conducted extensive work to develop supporting regulations, and rules were submitted for legislative approval in November 2011 (with action expected February 2012). Pilots of the system are already underway.

Key elements of Colorado's approach include the following:

- Creating a statewide standard for what it means to be an “effective” teacher or principal in Colorado;
- Creating a focus on providing meaningful feedback and support to educators to improve their practice;
- Ensuring that academic growth accounts for half of an educator's annual evaluation;
- Prohibiting forced placement of teachers;



- Making non-probationary status “portable;”
- Ensuring an annual evaluation of all teachers and principals; and
- Assigning each teacher and principal a rating of ineffective, partially effective, effective and highly effective.

Colorado has chosen pilot sites for the new system, and the pilots are already underway. (p. 120, 129-130) According to the request, the system will be used for continual improvement of instruction (p. 121), meaningfully differentiates performance into four ratings (p. 121), uses multiple valid measures (including student growth) (p. 122), requires regular evaluation (p. 124), will provide clear and timely feedback (p. 124), and will be used to inform personnel decisions (p. 124). The Colorado Department of Education will monitor local implementation, and ensure that local systems are valid. (p. 126-128)

Overall, Colorado's new statutory framework for teacher evaluation represents one of the most ambitious state legislative efforts to restructure teacher evaluation and Colorado is much further along in the development of its system than many other states.

#### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED’s waiver application, does the state’s request address this issue? [See full request]

Colorado does not discuss Principle 4 specifically, but one of its major actions – creating a Unified Improvement Plan process – was designed to reduce the administrative burden on LEAs. (p. 41, 103)



## Summary of State ESEA Flexibility Request

### STATE: FLORIDA

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

Florida's request presents a clear vision and a comprehensive, integrated plan that raises the bar on NCLB by transitioning to CCR standards and assessments, an aligned accountability system, and a rigorous educator evaluation system. The state's vision and focus, as described in the overview, is to "eliminate duplication and confusion created by two separate accountability systems...with a primary goal of increasing standards to achieve national and international competitiveness" (p.16). The state has adopted the Common Core State Standards (CCSS), and has a high quality plan to transition and implement the standards and aligned assessments through the provision of aligned instructional materials and professional development; expansion of accelerated learning opportunities; and collaboration with institutions of higher education (IHEs) and their teacher preparation programs.

The state's proposed accountability system promotes CCR through the inclusion of CCR measures (e.g., at-risk graduation rate, college readiness rates, participation and performance in accelerated curricula) and student growth, and also includes a focus on advancing achievement among the lowest-performing 25% of students. The state also further aligns its accountability and support systems. With regard to teacher and leader effectiveness, the state has codified in law, through the Student Success Act, a robust teacher and leader evaluation system that weights student growth as 50% of a teacher's evaluation and differentiates effectiveness with four performance categories. The state has a robust timeline and implementation plan for all LEAs.

2. How does the state **define college and career-readiness**? Does the request address both mastery of rigorous content knowledge and the ability to apply that knowledge

through higher order skills (such as critical thinking, problem solving, communication, collaboration, and meta-cognition)[See Overview; full request]

Florida's definition of college and career-readiness is, "Students are considered college ready when they have the knowledge, skills, and academic preparation needed to enroll and succeed in introductory college-level courses without the need for remediation in mathematics or English" (p. 31). The state's request references the attainment of more rigorous content knowledge and gives a few examples of application that students will need to demonstrate under new Achievement Level standards that are being established. The request also includes "higher order questioning and thinking" in its description of instructional reviews conducted for low-achieving schools.

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

Florida articulates its commitment to innovation, evaluation, and continuous improvement through revisions and improvements to its standards and assessments and accountability system. The state notes revisions it is making to its School Grades accountability system, and that its School Grades system is designed to accommodate progressive improvements in its own structure over the course of time. The state is also implementing new Achievement Level cut scores to better reflect increased expectations, and implementing college-ready cut scores for end-of-course assessments. The state also briefly notes that school support strategies may continually evolve.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Florida's request does evidence that they have the capacity to implement the proposed policies within the given timelines. Florida relies significantly on historical data to document its success in raising standards with a result in improved student achievement and reductions in achievement gaps. Also, given that its accountability system is not entirely new, and that it has made progress in implementing its teacher and leader evaluation system, the state appears to be in a strong position to implement its proposed policies in the allotted timeframe.

## **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

Florida presents a high quality plan for transitioning and implementing CCR standards and assessments. The state adopted the CCSS in July 2010, and has gone through an alignment process, which is still ongoing, of its Next Generation Sunshine State Standards and the CCSS. The Sunshine State Standards were cited as a resource for the development of the CCSS. The state has a clear timeline for implementation of the CCSS, beginning with students in kindergarten in 2011-12, who will be assessed on the standards in 3<sup>rd</sup> grade in 2014-15. Grades 3-12 have a blended approach with the primary focus on the CCSS plus any content still assessed on the current Sunshine State Standards.

The state also presents plans to analyze the standards in relation to English language learners (ELLs) and students with disabilities (SWDs). A comprehensive plan for outreach and dissemination of the standards is presented, with multiple modes of delivery to educators. Through professional development activities related to the state's Race to the Top (RTTT) grant and as required by state law, a coordinated system and plan for professional development is included in the request, with a focus on activities such as development and use of formative assessments and instructional use of student data.

The state also has provided and is continuing to develop high-quality instructional materials aligned with the CCSS, such as a web portal where teachers can access the standards and aligned teaching resources. Regarding access to accelerated learning opportunities, the state outlines many programs that it intends to continue and expand, such as a College Board partnership that increases minority participation in AP courses; incentive funds for schools and teachers based on participation and scores in AP and IB courses; and dual enrollment. The state also plans to work with IHEs to ensure that incoming teachers and principals are prepared to teach to the CCSS. The state plans to begin administering common assessments (it is a governing state in the Partnership for Assessment of Readiness for College and Careers (PARCC)) in 2014-15, and notes that the State Board of Education is poised to approve new passing and college-ready cut scores for its end-of-course assessments in December 2011.

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Florida will use an enhanced School Grades system to make accountability determinations. It will use letter grades (A-F) to refer to the categories of schools needing supports (Prevent, Focus and Priority) and the schools that will receive recognition (Reward). For elementary and middle schools, the grade is based on the performance on the Florida Comprehensive Assessment Test (FCAT) of all students in reading, math, writing and science (50% of grade), as well as the learning gains of all students (25% of grade) and the lowest-performing 25% of students (25% of grade). For high school, the grade is based on performance of all students in reading, math, writing and science (25% of grade); learning gains of all students (12.5% of grade); learning gains of lowest-performing 25% of students (12.5% of grade); performance and participation in accelerated curricula (18.75% of grade); overall and at-risk graduation rate (18.75% of grade); and college readiness in reading and math (12.5% of grade). Also, at least 50% of the low-performers must show learning gains in reading and math, or the school must show required annual improvement in that percentage, if not, the school's grade is reduced by one letter grade.

The state will classify schools and provide the appropriate rewards, supports and interventions based on the school's grade: Reward – "A" grade and schools that improve one or more letter grade; Prevent – "C" grade; Focus – "D" grade; and Priority – "F" grade.

The state is setting four ambitious, but achievable, AMOs: 1) School Performance Grade Target. Each school in the state will strive to achieve an "A" school grade; 2) Reading and Math Performance Target. This AMO sets targets for each school and subgroup in the state to increase the proportion of students scoring at level 3 and above and reduce the proportion of students scoring at levels 1 and 2 by 50%. AMO targets will be established separately for each subgroup and all students, and will be calculated at the school, LEA, and state levels. The state will report for each subgroup whether the target was met, whether the school has improved but has not met the target, or whether the subgroup's performance has maintained or declined; 3) Target for Progress of Students in the Lowest-Performing 25%. This target is calculated separately for both reading and mathematics and is based on the percentage of students in the lowest-performing quartile who made learning gains in the assessed subject areas. Schools must show that 50% of students in this group have made learning gains, or show improvement in the learning gains percentage from one year to the next; and 4) Benchmark Florida's

Student Performance to the Highest-Performing States and Nations. This is a statewide target that compares the state's student performance on NAEP, TIMSS, PIRLS, and PISA compared to the highest-performing states and nations.

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

Florida uses student growth measures as a significant part of its accountability system. The growth of all students and the lowest-performing 25% of students are included in calculating a school's letter grade. There are three ways to make learning gains (growth): 1) move up by one or more achievement levels; 2) maintain an achievement level (level 3, 4 or 5); or 3) increase performance within levels 1 and 2. The student growth model is not explicitly tied to continuous student growth towards CCR.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

Florida advances subgroup accountability and the closing of achievement gaps through the inclusion the learning gains for the lowest-performing 25% of students in the school grades calculation, and through the setting of targets and public reporting of whether each subgroup, for each AMO, met the target, improved but did not meet the target, or whether the subgroup's performance has maintained or declined. The state shows that subgroups with the lowest achievement and historically underperforming are over-represented in the lowest performing 25% subgroup.

4. Describe the state's general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

Florida's request provides information on the supports and interventions provided to schools designated as Reward ("A"), Prevent ("C"), Focus ("D") and Priority ("F") schools. Reward schools are eligible to receive additional state funding through the Florida School Recognition Program. Schools in Prevent status are required to prepare a school improvement plan and implement appropriate interventions, with LEA monitoring and support. Focus schools must implement school improvement interventions as directed and monitored by the LEA, and complete and follow a School Improvement Plan and District Improvement Assistance Plan. The state also provides support through a regional team. Schools in Priority status must implement more intensive interventions, and are required to conduct a diagnostic needs assessment.

If a school does not exit Priority status during the first year, the LEA must implement the turnaround option it has selected (reopen as a district-managed turnaround school; reassign students and monitor progress; close and reopen as a charter school; contract with a private entity to run the school; or hybrid model (proposed LEA flexibility)). The state relies heavily on its regional system of support. Five regional teams are each comprised of an executive director, instructional specialists, reading and STEM coordinators, and Response to Intervention Specialists.

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

Florida plans to address Priority schools through a plan that is focused on interventions in the areas of school leadership, operating flexibility, effective teachers, professional development, increased instruction and collaboration time, using data to inform instruction, non-academic factors and family and community engagement, and monitoring at the LEA and state levels. For example, Priority schools must replace the principal; have sufficient operating flexibility in areas such as staffing, use of time and budget; adopt a new governance structure; reassign or replace the majority of instructional staff whose students' failure to improve can be attributed to their effectiveness; provide for job-embedded professional development; extend the learning day; and use real-time data to inform instruction.

Priority schools must also implement one of the following state turnaround models: 1) reopen as a district-managed turnaround school (transformation/turnaround); reassign students and monitor progress (closure); close and reopen as a charter school (restart); contract with a private entity to run the school (restart); or implement a hybrid model. The state is requesting in its proposal the authority to offer the hybrid model to LEAs, which could be a hybrid of the current options or another model. LEAs that have a Priority school are required to submit a plan for review and approval by the State Board of Education, and the LEA must also have a dedicated turnaround director. One of the Regional Executive Directors is assigned to assist and oversee the turnaround implementation.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

Florida outlines previous and current efforts that have built capacity, including some RTTT projects, such as building rural LEA capacity to turnaround schools, and recruiting teachers in Miami-Dade and Duval counties. The state focuses a significant portion of

its plan to build capacity on its system of regional support, however, it should be noted the regional support system is predominantly focused on low-achieving schools.

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

Florida has a robust teacher and leader evaluation law, the Student Success Act (S. 1012.34) which meets the requirements of ESEA Flexibility and is in the process of implementation. The law requires 50% of evaluation results to be based on student growth, with the other 50% based on other measures of professional practice, such as classroom observations. Evaluation results are differentiated into four performance levels. Annual evaluations are required, with bi-annual evaluations for new teachers. Evaluation results are used to inform personnel decisions, such as salary adjustments and tenure decisions, and must be used in the event of workforce reductions. By December 1, 2011, all LEAs will have submitted revised teacher and leader evaluation system plans to the state for review. The SEA will review and approve all plans for implementation during 2011-12.

### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

Florida includes a reference to reducing administrative/reporting burden by stating that it convened a Paperwork Reduction Task Force and recommendations were put into law in 2006, and that "both SEA and LEAs review requirements annually and continually seek ways to ease the paperwork and reporting burden" (p. 18).



## Summary of State ESEA Flexibility Request

### STATE: Georgia

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**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

Georgia's request presents a clear and compelling vision for movement to a state system that is truly grounded in a definition of college and career-readiness. The central focus is the institution of an accountability and support system that will provide actors at every level with meaningful and actionable information. The state has articulated and built its request around its definition of what it means to be career-ready (as a co-equal element of college and career-readiness).

The state's request includes: a clear plan for the continued implementation of the Common Core State Standards and aligned assessments; a completely new accountability and support system that is complex yet a deliberate break from the narrow focus of NCLB; and a detailed plan for the continued development of teacher and leader evaluation systems.

The College and Career Ready Performance Index (CCRPI) is the accountability and improvement system that is at the core of the state's request. In its narratives on standards implementation and accountability and supports, the state's request elaborates on the vision for college and career-readiness, including through examples of the foundation that has already been established, the buy-in that has been achieved, the ways in which its CCRPI and report card will focus attention on the measures that matter most for students, and its plans for following through on that vision.

2. How does the state **define college and career-readiness**? [See Overview; full request]

Georgia defines college and career-readiness as "the level of achievement required in order for a student to enroll in two or four year colleges and universities and technical colleges without remediation, fully prepared for college level work and careers, including the United States military." The state's request is built around the vision of ensuring that "the K-12 experience provides students with the academic preparation to compete globally with career development skills aligned to the evolving requirements" of the state's workforce. (p. 13-14) It goes on to note that this means "that all students graduate from high school with both rigorous content knowledge and the ability to apply that knowledge through higher-order skills including, but not limited to, critical thinking, problem solving, communication, collaboration, and student agency." (p. 14) It includes a focus on global competency and competitiveness, the application of knowledge, and world language mastery.

Strategies for achieving this vision are detailed in several core aspects of the state's request. For example: student mastery of knowledge and skills is a focus of the state's current work on and future plans for the implementation of the CCSS. This includes "strengthening teacher content knowledge, pedagogical skills, and contextualized student tasks that effectively engage the 21<sup>st</sup> Century Learners..." (p. 20) In addition, the CCRPI includes an array of measures that are intended, at least in part, to assess student mastery of both rigorous content knowledge and the ability to apply , such as AP and IB course taking and performance; SAT and ACT scores, and course pathway completion.

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

Georgia's request provides several examples of its commitment to innovation, evaluation and the continuous improvement of its systems. There are some examples of how the state has ensured this in the past, such as by learning from the weaknesses of its train-the trainer model that were exposed during its last round of standards implementation, and the external validation and refinement of its School Keys tool for school improvement. Now and moving forward, the state's 37 RTTT LEAs (which serve 40% of the state's total student enrollment) play an important role in innovation, evaluation and continuous improvement. These LEAs are piloting several key aspects of the state's systems and their efforts will inform further changes. For example, the RTTT LEAs are using the new guidelines for reviewing and revising principal induction programs before these guidelines will be made applicable to all other LEAs. RTTT LEAs

have piloted district-level early warning criteria and interventions. They will also serve as the pilot districts for the Teacher Keys Evaluation and Leader Keys Evaluation system guidelines.

In its standards implementation plan, the state's request notes a partnership with SEDL for the design of a database for collecting professional learning participation and feedback. The feedback will be used to better address the needs of teachers over time.

In its request, the state also notes it plans to pilot its CCRPI accountability system in 2011-12, and to make any necessary adjustments before moving from this "hold harmless" year to full implementation. At the local level, the state notes that LEAs will be given room to innovate by tailoring the Factors for Success measures of the CCRPI to focus on things that are local priorities.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Georgia's request builds on a number of efforts that are already underway – most importantly the state's CCSS implantation and its development of guidelines for a teacher and leader evaluation system under RTTT. Both of these projects began more than a year ago and have included significant stakeholder engagement. This history, plus the state's inclusion of detailed plans for completing this work, is evidence of the state's capacity to implement the systems that make up its request.

Moreover, the state's request anticipates the continuation of a few key partnerships that strengthen the state's capacity. In its plan for standards implementation, the state notes the role that the sixteen Georgia Regional Education Service Agencies (RESAs) will play in orientation and instructional leader training. The RESAs appear to be an important element of the state's capacity and are participating in literacy and formative assessment training to support the standards implementation. In addition, the RESAs, along with colleges, universities and regional labs, are collaborating with the GaDOE on its statewide system of support.

The plan also evidences partnerships with other entities, like Georgia Public Broadcasting, through which the GaDOE is augmenting its capacity to implement its standards and other aspects of its system.

## **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

Georgia's request includes some information on the CCSS implementation work that has already been completed, along with its plan for additional implementation support over the next two years. The Georgia State Board of Education adopted the Common Core Georgia Performance Standards (CCGPS) in July 2010 and implementation efforts began immediately thereafter. Full implementation will be achieved in 2012-13. In 2014-15 the state will transition to the PARCC assessments.

Georgia's request provides some history on its transition to college and career-ready standards and assessments, including movement from old standards to the Georgia Performance Standards, and now to the CCGPS. The request details a number of ways through which the state expects the CCGPS to help all students achieve college and career-readiness, along with some information on specific actions that were taken to develop the standards (including IHE participation) and in implementing them to date.

Georgia began its CCGPS implementation with extensive training for district and school level administrators, RESA curriculum staff, and 5,000 instructional leaders across the state. Others were introduced to the CCGPS through presentations, conferences, and curriculum meetings. This was followed in September 2011, by a "Common Core Orientation" that was broadcast statewide, through a partnership with Georgia Public Broadcasting. Through this broadcast, the state was able to reach administrators, teachers, counselors, postsecondary educators, parents and community members. There is a particular focus on training for instruction and supports to students with disabilities and English language learners. This includes a statewide professional development campaign with educator training on standards-based instruction for English learners, data mining workshops, and other targeted activities.

Moving forward, in the winter and spring, the state will offer professional learning sessions for administrators, teachers, and instructional leaders. These will be offered in person as well as through webinars and video conferencing. CCGPS ELA training will include a focus on the state's literacy standards for history/social studies, science and technical subjects. Text complexity and integrated instructional units will be two areas of focus. Math training will include reasoning and explaining; modeling and using tools; and seeing structure and generalizing. A major focus will be on the CCGPS skills and concepts that are now going to be covered in a different grade than they were under the state's former standards.

The request also highlights the alignment of the World-Class Instruction, Design and Assessment (WIDA) English Language Proficiency (ELP) standards and the CCSS. Georgia will incorporate the amplified WIDA standards for ELP students, to be released in spring 2012, into its efforts.

With regard to its transition to college and career-ready assessments, the state's request provides high level detail on its shift from End-of-Course Exams (which are now being aligned to the CCGPS) to Common Core Assessments in 2014-15. The state notes that its Criterion-Referenced Competency Tests are aligned to the CCGPS in LEA and Mathematics.

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Georgia's request is bold in its vision for a truly new and more rigorous, multi-faceted accountability and support system designed to get all students to college and career-readiness. This system meets (and goes beyond in several ways) the ESEA Flexibility Principles and also closely tracks the CCSSO Principles. Under its request, the state seeks to use the CCRPI for school and district accountability determinations made based on 2011-12 data, though 2011 AYP determinations will be used to determine supports and interventions. This "hold harmless" year will allow for the state to test the new system, get feedback on it, and make any necessary revisions before it takes full effect in July 2013.

This new system includes multiple categories of indicators for each of three school configurations – high schools (grades 9-12) middle schools (grades 6-8) and elementary schools (grades K-5). It puts real emphasis on both content mastery and career readiness, along with other measures. The state provides a detailed list of each category and measure as Appendix A. These include the following:

- High School – Graduation Rate; Student Attendance; Post High School Readiness (course pathway completion; industry-recognized credentials earned; work ready certificates earned; college enrollment not requiring remediation; credit for accelerated enrollment in AP, IB, Early College and other similar programs; world language credits earned; scores on AP/IB courses and the ACT, SAT and Georgia High School Writing Test); and Content Mastery (scores on eight state end-of-course tests).

- Middle School – Content Mastery and Preparation for High School (state assessments in ELA, reading, mathematics, science and social studies, as well as on the Grade Eight Writing Assessment; students in grade eight achieving a state-established Lexile measure); Student Attendance; Support and Intervention (ELL students with positive Performance Band movement; SWD served in the general education environment greater than 80% of the school day; and 8<sup>th</sup> grade students passing at least four core content area courses); and Career Exploration (8<sup>th</sup> grade students completing an Individual Graduation Plan; students completing three or more Career Interest Inventories).
- Elementary School – Content Mastery and Preparation for Middle School (state assessments in ELA, reading, mathematics, social studies, science, as well as on the Grade Five Writing Assessment; students in 3<sup>rd</sup> and 5<sup>th</sup> grade achieving a state-established Lexile measure); Student Attendance; Supports and Intervention (ELL students with positive Performance Band movement; SWD served in the general education environment greater than 80% of the school day; and Career Awareness (5<sup>th</sup> grade students completing ten Career Awareness Modules; and 5<sup>th</sup> grade students with a Career Portfolio).

Each school will get a separate score for each of the following areas of focus: Achievement, Achievement Gap Closure, and Progress. These three scores will be weighted and combined to produce an initial Overall CCRPI Score. This score may then be adjusted upward on the basis of bonus points earned on an array of other measures described as Factors for Success.

The state's school and district report cards (a draft template of the report card/score report is included as Appendix K, p. 242) will also include an array of colored flags (Green, Yellow, and Red) indicating the performance of each subgroup. Green Flags indicate subgroup performance "highlights". Red Flags indicate subgroup performance "challenges". Yellow Flags indicate the failure of a subgroup to meet Performance Targets on statewide assessments, but with significant growth under the statewide growth model. (p. 17) These flags carry no weight in the index, however, Red Flags serve as early warning indicators and must be specifically addressed through improvement strategies and actions spelled out in an improvement plan.

Schools will also receive a Financial Efficiency rating and a School Climate rating (including teacher and leader effectiveness data), both of which will also be taken into consideration in improvement planning. Neither of these ratings, however, is factored into the combined CCRPI score for a school.

With regard to the establishment of AMOs or performance targets, the state has opted to base its targets on the goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. Through its use of a student growth component, the state will set high expectations for all students while also recognizing those who do not yet meet performance targets but make significant gains. The state does not propose to use different AMOs for different subgroups of students.

For the Achievement Score, the state established targets for the "all students" group based on the goal of 100% proficiency. One of the three pillars of the CCRPI is the Achievement Gap Closure Score; the goal is to decrease the percentage of all students and students in the High Needs Students group not meeting proficiency by 50% by 2016-2017. The Progress Score is based on progress toward 100% proficiency using a tiered approach and Individualized Progress Goals (IPGs) for schools performing below the target. Student growth will be infused into the Progress Score once the statewide growth model is implemented, allowing for both school level progress and student level growth.

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

Georgia's request notes that the state is developing a statewide growth model, under its RTTT grant, for implementation during the 2011-2012 year. A steering committee is working on the design and the selection of a model is anticipated to be made before the end of the calendar year. The state's request indicates that the model will utilize norm and criterion referenced data in making growth predictions. Once completed, as noted above, this growth measure will be factored into the CCRPI Progress Score for schools.

Student growth is also reflected as part of the subgroup Performance Flags that are to be reflected on the school and district report cards/score reports. Whereas Green Flags indicate subgroup performance "highlights" and Red Flags indicate subgroup performance "challenges," Yellow Flags are displayed where the subgroup demonstrated significant growth under the statewide growth model yet failed to meet the Performance Target. (p. 17)

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

Georgia is addressing subgroup accountability and closing achievement gaps through the Achievement Gap Closure Score of the CCRPI. It is used to compare the annual



progress toward gap closure by 2019-20 both "within a school" and "school to state", focusing on the performance of the lowest quartile of learners (High Needs Students or HNS) across all subgroups in the school. The "within a school" comparison will look at HNS performance in comparison with the school's 75<sup>th</sup> percentile score (Non High Needs Students). The goal is to decrease the percentage of all students and students in each subgroup not meeting proficiency by 50% by 2016-2017.

In addition, the state's school and district report cards will also include an array of colored flags (Green, Yellow, and Red) indicating the performance of each subgroup. These flags carry no weight in the index, however, Red Flags serve as early warning indicators and must be specifically addressed through subgroup specific improvement strategies and actions spelled out in an improvement plan.

The state's belief that "quality implementation of the Common Core Georgia Performance Standards CCGPS is the most effective way to address equity for students" leads to a focus on the standards as a key element of school improvement with particular emphasis on underperforming groups. (p. 34)

4. Describe the state's general system of **supports and interventions** for all schools and those designated as priority, focus or reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

Georgia's request presents a clear and comprehensive plan for the transition to a system of supports and interventions that flows directly from the CCRPI. The state will continue to serve schools and districts on the basis of its 2011 AYP determinations for the initial year under the CCRPI. This "hold harmless" transition year will allow for the use of CCRPI data in determining how best to support and intervene in schools and districts even as the state tests and refines its index. The CCRPI will take full effect with the annual determinations made in July 2013.

As background, the state notes that a weakness of the NCLB accountability system was that it did not lead to school improvement or even meaningful gains in student achievement, particularly among high schools. The state's request describes the lessons it has learned through SIG school identification and years of NCLB supports and interventions and, more importantly, how it plans to draw from those lessons under its new system to identify issues sooner and provide more efficient supports.

Under the state's request, each year every school and district will receive a CCRPI score sheet with an overall CCRPI score and other data. On the basis of this data, the state

will identify Reward Schools and Focus Schools. Reward schools are those Title I and non-Title I schools with highest performance on statewide assessments, gap closure, the CCRPI overall score and CCRPI gap closure. Focus schools are those with the largest "school to state" achievement gap. The state may also identify other schools for improvement support. In addition, a wide array of resources, tools and other supports have been developed to promote the continuous improvement of all schools and districts.

Through its request, Georgia seeks to waive the NCLB public school choice and Supplemental Educational Services requirements. These will be replaced by a state law choice requirement and a new state-defined Flexible Learning Program (FLP). Focus schools must offer FLP.

With regard to other schools and LEAs identified by the state, school improvement specialists will provide on-site support (aligned with standards for school performance and informed by subgroup Performance Flags). These specialists will also work with schools on data analysis, the determination of root causes, the development of goals and improvement actions and more.

Beyond these "targeted" supports, the state has made a number of resources universally available. Training is made available to the extent possible. The Georgia School Keys is an externally validated tool with standards for schools (with strands that include curriculum, assessment, instruction, leadership school culture, and more) and descriptors of the expected practice. This tool is a guide for school improvement efforts statewide. Two companion tools - Implementation Resources and the Georgia Assessment of Performance on School Standards (GAPSS) Analysis – are among the other improvement resources that the state has developed and disseminated.

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

Georgia's request includes a clear plan for the identification of and intervention in Priority Schools that includes a focus on both the USED turnaround principles and the CCSSO next-generation accountability principles. In particular, Priority Schools will be identified on the performance of the "all students" group statewide assessments that are part of the CCRPI (this includes assessments in other subjects such as science and social studies.) or a graduation rate of less than 60 percent. Once identified, they will receive state support and oversight for their implementation of turnaround strategies for at least three years.

Priority Schools will be served directly by the GaDOE School Improvement Division, though the state does not propose to actually take over the management or operation of any schools. A school improvement specialist and other SEA staff will work with LEAs in providing support to Priority Schools and to develop and monitor the implementation of a short-term action plan.

The LEA and SEA must work collaboratively "to analyze data and root causes to identify actions, strategies and interventions for the school improvement plan." (p. 55) Other data, such as student attendance, teacher attendance, and student discipline referrals, must also be analyzed. This analysis is to inform the development of a plan for improvement.

An agreement between the SEA and each LEA with an identified school will outline "the expectations of the LEA, school and the GaDOE." (p. 33) The state presents an array of "non-negotiable actions and interventions" that must be taken with regard to Priority Schools and that are to be incorporated in memorandum of agreement. They align closely with the Turnaround Principles and include actions such as: assessing the performance of the current principal and replacing the principal if necessary; working with the state to screen teachers that are transferred to the school; analyzing data and root causes; requiring collaborative planning; participation in required professional learning; implementation of the CCSS ELA and math frameworks; and the identification and support of students at risk of not graduating.

Priority Schools (like Focus Schools and all other schools in the state) will be subject to a new state law on school choice and a new SEA-developed Flexible Learning Program (FLP). They must also set-aside 10% of the school's Title I allocation for professional development.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

Georgia is undertaking significant steps to build the capacity of schools and districts. In addition to the support that is to be provided to schools identified as Focus and Priority, the state has and will continue to make a number of resources widely available for the purpose of supporting continuous improvement and building capacity. These include: Georgia's School Keys (an externally validated tool with tools for improving curriculum, assessment, instruction, planning and organization, professional learning, and more) Implementation Resources, and the Georgia Assessment of Performance on School Standards (GAPSS) Analysis. School improvement specialists will provide on-site support (aligned with the standards for school performance and informed by the

subgroup Performance Flags) to identified LEAs and schools. These specialists will also work with schools on data analysis, determination of root causes, development of goals and improvement actions and more.

The state's request also includes a focus on building capacity for CCSS implementation as a core school improvement strategy. Within its CCSS implementation plan, the state highlights its partnership with higher education for pre-service work on the CCSS, and Induction Task Force working on induction guidelines for new teachers and principles with a focus on CCSS. (p. 26)

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

Georgia began implementing its plan for educator evaluation in 2010-11 under its RTTT grant. The state's request describes its plan for the continued development and implementation of this evaluation system that meets USED requirements. The state has completed the development of guidelines for teacher and principal evaluations and is beginning a six-month pilot in 26 RTTT districts in January 2012. These districts will move to full implementation by the beginning of the 2012-2013 school year. Although the request incorporates a letter from the Governor expressing his support for this effort, the narrative does not specifically address the fact that state legislative action is likely needed to ensure statewide implementation.

The teacher and leader evaluations systems are being designed to place a primary focus on student achievement gains (at least 50% of ratings will be based on student progress) among other measures such as rubric-based observations of practice and process and surveys. The measures will be part of an annual evaluation and are to be implemented statewide in 2014-2015.

Georgia's request expresses a clear commitment to ensuring fidelity of implementation by LEAs. The request touches briefly on the communication, training, coaching and feedback opportunities that will be provided. Among them, the state will use an electronic platform (embedded within the longitudinal data system) for collecting data from rubric-based observations, surveys, and other data sources. RTTT district leaders will also receive training and coaching from a team of specialists. With this support, both in terms of data accessibility and coaching, the state has confidence that full implementation can be achieved.

Once in place, educator effectiveness ratings will be factors that make up the School Climate Rating component of the CCRPI. The evaluation system will also be used in making personnel decisions including compensation, promotion/career advancement, and dismissal. A "more rigorous and quantitatively-based evaluation system" will be developed and will be used as part of a performance-based compensation system that will be put in place for teachers in 2013-2014. (p. 76)

**Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

Georgia's request indicates that "throughout the transition to this new system and beyond" the state will ensure that LEA and school leaders have opportunities to share ideas for reducing administrative and reporting burdens. (p. 18)

## Summary of State ESEA Flexibility Request

### STATE: Indiana

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

Indiana's request provides a comprehensive plan for transitioning to more rigorous standards and assessments, implementing a strong new state accountability system, and continuing implementation of a robust educator evaluation system. The state has aligned all its initiatives around State Superintendent Tony Bennett's "90-25-90" goals of 90% of students passing the state's annual assessment, 25% of students passing AP/IB exams or earning college credit in high school, and 90% of students graduating with a meaningful diploma. The state has designed a rigorous new school grading system and a set of intensive supports for chronically low-performing schools. Additionally, the state is already piloting a robust new teacher and leader evaluation system that incorporates multiple measures and is anchored in student achievement. The accountability system and educator evaluation system are connected and the state plans to use data across systems to identify discrepancies and target assistance.

2. How does the state **define college and career-readiness**? [See Overview; full request]

Indiana defines college and career-readiness as earning an academic honors diploma, passing an AP/IB exam, earning college credit in high school, or passing an approved industry certification exam. The state notes that students who meet at least one of these indicators are significantly less likely to require post-secondary remediation.

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

Indiana's request notes that it will have the ability to review and increase required proficiency levels needed to achieve each letter grade in the school accountability system. Additionally the state is developing an "automatic trigger" to ensure that the proficiency bar remains high for all schools. The state will also reevaluate growth and improvement targets at least every three years to maintain a focus on continuous improvement and not allow schools to maintain their grade without ongoing improvement.

The state is also piloting its educator evaluation system to collect quantitative and qualitative data to refine the model before it is implemented statewide. The pilot includes teacher and principal surveys, focus groups, and interviews to ensure that feedback is incorporated to drive system improvement.

The state also highlights several innovation local programs in its application including a dual credit cooperative among districts, payments to students and teachers for passing AP exams, districts tracking students' post-secondary outcomes, and use of online providers for AP courses.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Indiana is building capacity to support its request through shifting the role of the state education agency from a compliance-based organization to one that is more supportive of schools and districts and has a greater focus on fast-paced reform and is more innovative. The state agency was reorganized in July 2011 to better align with the state's education priorities. The Office of School Improvement and Turnaround will provide extensive support in implementing the state's new accountability system and providing supports and interventions to Priority and Focus Schools. The Office of Educator Effectiveness and Leadership will support districts as they move to implement new evaluation systems.



## **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]]

Indiana is in the second phase of a comprehensive plan to implement new Common Core State Standards (CCSS) and realign state assessments. The state has conducted alignment studies, developed transition guidance, and is now in the process of providing multi-stage professional development to district and school leaders.

Indiana has developed detailed plans to make CCSS accessible to English language learners (ELLs) and students with disabilities. Based on its participation in the World-class Instructional Design and Assessment (WIDA), Indiana is planning to revise its English Language Proficiency Standards by 2014-15 with support from a new Coordinator of English Learning and several stakeholder and advisory groups. The state is also analyzing how to ensure that students with disabilities can also access CCSS. The state is using Acuity assessments as a diagnostic and predictive measure of whether students are on target to pass standardized assessments. Schools are able to use this information to tailor instruction, while the state plans to use it to identify promising instructional practices for replication.

The state has planned three stages of professional development: transition planning, deeper understanding of content frameworks, and tools and resources. Currently, the state is providing training to give district and school administrators and curriculum directors a deep understanding of the new standards and content frameworks. The state is working collaboratively with educators in K-12 and higher education to develop guidance documents and has produced videos that detail instructional changes that CCSS will require and the associated tools and resources.

The state has also evaluated the quality and alignment of its textbooks and curricular materials and is working with a curriculum council to develop and vet instructional materials. Finally, the state has put a strong emphasis on accelerating learning opportunities by expanding access and enrollment in Advanced Placement (AP) classes and providing state college credit for students who successfully pass AP exams. The state is also increasing the number of schools that offer an International Baccalaureate (IB) program. To further incentivize accelerated learning, the state provides a \$4,000 scholarship to students who graduate from high school in 3 years and allows students to receive credit for courses by demonstrating proficiency.

The state is currently piloting interim use of ACT and SAT assessments to provide transition to CCSS expectations for high schools before PARCC assessments become

available. Indiana will use existing determinations of college-readiness defined on these tests and determine through the pilot whether to use these assessments until PARCC assessments are implemented. The state is also incorporating CCSS items into state assessments to the extent possible and will report separate subscores on CCSS assessment items where possible.

The state has also placed a major focus on teacher preparation and licensing as key levers in ensuring quality standards-aligned instruction. The state is currently developing licensure assessments to measure candidates' mastery of newly developed teacher standards that are aligned to CCSS. Additionally, the state is developing a CCSS-aligned basic skills test that will be required for admission to any teacher preparation program in the state beginning in 2013.

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Indiana proposes to use an A-F grading system for all schools and districts with the goal of improving clarity and increasing stakeholder engagement in comparison to its previous system. The state has separate metrics for elementary/middle schools and high schools based on data and assessment availability. Elementary and middle schools are evaluated based on student achievement in English language arts/math and student growth. High schools are evaluated based on student achievement on End-of-Course exams in English and algebra, 4 and 5-year graduation rates, and college and career-readiness as measured by AP/IB exams, dual enrollment, and industry certification.

The state plans to calculate AMOs based on school grades with the ultimate goal of all schools and subgroups receiving an "A" or improving by two letter grades by 2020 and having all subgroups receive at least a "C" or show substantial growth. Additionally, schools must receive an "A" or improve by at least one letter grade by 2015. If the state is able to reach this goal, it will have reduced its achievement gap by 20% by 2020 and 65% of all non-proficient students will become proficient. The state notes that it selected these AMOs because they place a much larger focus on college and career-readiness than the default alternatives provided by USED.

In the state's grading system, Priority schools are defined as those that receive an "F" or a "D" or "F" for two or more consecutive years. Focus schools are those that receive a "D." The state notes that in modeling, 95% of Title I schools with the largest achievement gaps would be captured in this definition.

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

Indiana plans to use a growth model similar to that in use in Colorado that makes use of student growth percentiles (SGPs) to evaluate student growth from year-to-year based on peers across the state. The accountability system includes measures of student growth for elementary and middle schools with metrics for growth of students in the bottom 25% and growth of the remaining 75% of students. The state defines high growth as being above the 65<sup>th</sup> percentile and low growth as falling below the 35<sup>th</sup> percentile.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

Indiana proposes using a super subgroup composed of the bottom 25% of students in order to target achievement gaps. The request notes that while many Indiana schools have underperforming student populations, the size of subgroups frequently falls under the threshold required for accountability.

The state presents strong data demonstrating that students in this new supergroup are historically underperforming. Indiana's modeling indicates that students in the bottom 25% pass the state assessment at a rate 50% lower than the top 75%. Additionally, students in traditional subgroups that are not included in the bottom 25% have an average pass rate of 90%. Finally, the state notes that a greater percentage of schools will have students from each NCLB subgroup population included in subgroup calculations than they would if subgroups were defined by individual NCLB groups.

4. Describe the state's general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

The state will make use of Technical Assistance Teams (TAT) to conduct quality reviews of schools designated as Focus and Priority schools to make recommendations for interventions. These reviews will recommend interventions tied to The Mass Insight Readiness Model. The interventions will center on readiness to learn, readiness to teach, and readiness to act and could include changes in staffing, scheduling, or performance incentives. The LEA then implements these interventions with support and oversight from the IDOE. The state does not fully describe the system of supports and interventions offered to other schools beyond the Focus and Priority categories.

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

LEAs with schools identified as Priority or Focus schools will be required to select and implement interventions from a framework developed by Mass Insight. Plans for these interventions will be submitted to the state education agency for review to ensure the selected interventions match school needs. LEAs that fail to comply will risk losing their school improvement funding. Additionally, the state will conduct monitoring visits to determine the fidelity of intervention implementation.

The state has recently implemented a process of school turnaround in which an external management team is assigned to a school to operate either part or all of a school using existing school funding. This is the most dramatic intervention used in the most chronically under-performing schools. Other Priority schools receive partners to work with leadership to implement targeted improvements. Both external management teams and partners have specific data benchmarks they must meet. The turnaround process has a particular focus on family and community engagement as key variable for generating support for turnaround and sustaining improvement.

Under Indiana's proposed accountability system, Priority schools must hold a public hearing and revise their school improvement plans during years 1-3 of identification. The local board can also request that the State Board of Education appoint an outside team to assist in development of a new plan. In years 4-5, the state appoints a technical assistance team to conduct a comprehensive review and make a recommendation for significant intervention. If a school reaches Priority status for a 6<sup>th</sup> year, the state board conducts a hearing to consider options for the school including merger, external management, or other options.

The state notes a desire to expedite the current six-year timeline for direct state intervention in Priority schools and State Superintendent Bennett is planning to ask the legislature to allow state intervention after four consecutive years as an "F" school or five consecutive years as a "D" or "F" school.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

The state plans to provide Priority and Focus schools with the Mass Insight Readiness Model turnaround framework to help drive the interventions needed in schools and improve their capacity to raise student achievement. This model can include assessment and data analysis training, revised schedules, extended learning time, etc.

The state also plans to collect and disseminate promising practices from reward schools to schools across the state.

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

Indiana passed legislation in 2011 requiring LEAs to develop educator evaluation systems by July 2012 and is currently piloting both a state model and district-developed models in a total of 6 districts. The state model was developed with extensive input from educators and the pilot is being overseen by an Educator Evaluation Cabinet of key stakeholders.

The state's educator evaluation guidelines require annual evaluation, use of multiple measures, feedback tied to professional development, and use to inform personnel decisions including tenure attainment and loss. The state has developed a default model that it is currently piloting and that districts will be able to adopt fully or in-part. Districts that modify the state model or propose alternate systems must meet state guidelines. The state has a statewide growth model in place for reading and math in grades 4-8 and has established working groups of teachers to identify ways to measure growth in non-tested grades and subjects. Indiana is also conducting training across the state to prepare for statewide implementation.

The state is gathering data and feedback during this pilot to inform statewide implementation in the 2012-2013 school year. Principal evaluation is still under development, but will include the school's accountability grade as a factor. Additionally, the state plans to examine any significant discrepancies between school grades and educator evaluation ratings.

### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

Indiana aims to increase alignment of efforts and funding through LEA reporting and approval of school intervention plans. The goal is to align federal and state efforts into a coherent strategy grounded in data to meet student needs.

## Summary of State ESEA Flexibility Request

### STATE: Kentucky

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

Kentucky presents a comprehensive vision and strategy for achieving college and career-readiness for all students that fundamentally rethinks school and district accountability with an innovative and broad approach. The Unbridled Learning agenda encompasses a transition to college and career-ready standards and assessments, a significantly more robust school and district accountability system, and a plan to implement a rigorous new educator evaluation system. While the plan is complex, there is a clear underlying theory of change and a goal of raising college and career-readiness rates by 50 percent by 2015.

2. How does the state **define college and career-readiness**? [See Overview; full request]

Kentucky has defined college-readiness via cut-off scores on the ACT or two alternate college placement tests which indicate that a student does not require remediation at the post-secondary level. The career-readiness definition includes both an academic requirement as well as a technical component that can be met via an occupational skills assessment or industry certification. The state has developed a strong partnership with the Council on Postsecondary Education (CPE), which helped define what college readiness means in the state and achieve consensus on the definition and measures of college-readiness from all public universities in the state.

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

The Kentucky approach is extremely innovative and far different from previous federal (or most state) accountability systems. This system is innovative for many reasons, notably in its breadth, its clear anchor and link to college and career-readiness, and its focus on continuous improvement for schools. Within student outcome accountability measures, there are a variety of new measures including achievement in five subjects, growth in reading and math, a non-duplicated gap group to capture low-performing subgroups in five subject matter areas, and measures of college and career-readiness that are aligned with assessments across all tested grades. In addition to these measures, the state intends to add a measure of the quality of instructional programs in several non-tested subjects and grades, and a measure of educator effectiveness.

The accountability and education evaluation systems are new systems that do not have strong baseline data, but the state has committed to ongoing monitoring, research, and adjustments to address issues that arise and has articulated a set of specific research questions it intends to evaluate over the coming years. The state intends to recalibrate the accountability targets for schools after five years (and in ongoing five-year cycles moving forward). Also, it notes that it intends the educator evaluation statewide pilot to provide extensive data and information to inform full state-wide implementation.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Kentucky has many existing state structures that it intends to leverage in implementing its proposed request which provide strong capacity. The state intends to use the existing Regional Leadership Networks (RLNs) to support implementation of new standards and assessments. The state is also using regional Special Education Cooperatives to ensure that students with disabilities have access to the same rigorous content as their non-disabled peers. Kentucky also has a financial commitment to CCSS implementation of both state and private resources. Additionally, the state has established a strong partnership with the Council for Postsecondary Education (CPE) which was a leader in developing a definition of college-readiness in the state and continues to play an important role in the implementation of CCSS and aligned assessments. This partnership provides additional capacity and alignment across the P-20 system.



The state also appears to have strong capacity to implement school turnaround through the Office of District 180 and the associated Centers for Learning Excellence (CLE), which provide direct and embedded support to schools and districts. The state's request speaks to its successful history in implementing interventions to improve low-achieving schools and the depth and quality of human capital that it has available for this work. Finally, the request notes that the pilot year for teacher and leader evaluation will be used to develop and ensure LEA capacity for implementation.

### **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

The state has a robust and comprehensive plan to transition to CCSS and assessments that has been thoughtfully developed and has been underway since 2010. As the first state to adopt CCSS, Kentucky has been a leader in this area. The state's CCSS implementation strategy has a focus on capacity-building through the Regional Leadership Networks. Professional development for teachers has been strategic, with an initial focus on learning about and understanding the new standards, and a subsequent focus on implementation in the classroom.

The request also presents a clear system for analyzing and addressing the needs of English language learners (ELLs) and students with disabilities. The state has developed an online professional learning community around successful instructional and assessment practices for ELLs as well professional development on differentiating instruction to enhance student learning. Additionally, the state is leveraging regional Special Education Cooperatives to provide direct on the ground support to teachers working with students with disabilities.

The state is undertaking numerous efforts to aid teachers with shifting their instructional practice to facilitate successful implementation. To support development of aligned curriculum, the state has developed a Model Curriculum Framework (MCF) that is a resource to facilitate local curriculum development. Additionally, the state is currently developing an online technology platform with access to exemplar lessons, strategies, and instructional materials. Further, to facilitate public awareness and engagement, the state has developed online learning modules for parents and other stakeholders to learn more about the new standards and assessments.

Finally, Kentucky has undertaken an ambitious initiative to develop aligned assessments across the grade 3-12 spectrum anchored in the college-ready measure (and associated

cut scores) of ACT. The work to develop aligned and linked assessments that provide an annual measure of whether a student is on or off-track for college-readiness is notable.

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Kentucky proposes to use accountability measures across three categories: Next Generation Learners, Next Generation Instructional Programs, and Next Generation Professionals. While only Next Generation Learners will be implemented in 2011-2012, by 2013-14 the state will weight each component as follows: Learners (70%), Instructional Programs (20%), and Professionals (10%). Within the Learners (student outcomes) category, there are five key areas of measurement: achievement, gap reduction, growth, graduation rate, and college and career-readiness. All schools are evaluated on achievement, gap reduction, and growth. Middle and high schools are also evaluated on college and career-readiness, and high schools are also evaluated on graduation rate. The Instructional Program Review will cover non-tested grades and subjects including arts & humanities, writing, world language, practical living/career studies, and K-3. Teacher evaluation ratings are still in the design process but will ultimately be weighted in overall school scores.

The methodology for calculating overall school and district AMOs is based on a model of continuous improvement in which all schools and districts must demonstrate improvement each year. This system is predicated on the need for lower-performing schools to demonstrate greater improvement than higher-performing schools. The state will calculate an average accountability state score and standard deviation as well as the distribution of scores. Proficiency will be defined at the 70<sup>th</sup> percentile, and distinguished will be set at the 90<sup>th</sup> percentile. Schools scoring below proficient will be required to achieve a standard deviation of growth within five years (or 1/5 standard deviation each year) to meet their AMO. (Note: The amount of required growth is a point still under discussion with the U.S. Department of Education.) Schools at or above proficient are required to reach ½ of this goal. If a school meets its AMO, it is considered to have made AYP. At the end of each five year cycle, each school will have a new set of targets to drive improvement.

The state also plans to set AMOs for each subgroup at the state, district, and school level that will be based on student outcome data. These AMOs will be annually reported in the school/district report card. The state has established a goal of reducing in half the percentage of students in each subgroup who are not proficient.

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

The state plans to measure growth in reading and math for grades 4-8, as well as measuring growth between the 10<sup>th</sup> grade ACT PLAN and the 11<sup>th</sup> grade ACT administration. The growth model for student learning outcomes uses a student growth percentile that gives credit to schools and districts for students who demonstrate typical or higher levels of growth. While overall the growth model supports continued improvement, the individual growth measure is based on normative growth rather than growth to standard.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

While the state will report disaggregated data for all subgroups as per prior federal requirements, the new accountability system proposes a new way to address subgroup accountability through the creation of a non-duplicated gap group of students from traditionally lower-performing NCLB subgroups. All of these students will be included, but each student will count only once. This will lead to many more schools reaching the “n” size threshold to be held accountable for these students, and this “gap” variable is heavily weighted in the overall school performance score. Schools receive credit for the percentage of students in this group who perform at or above proficient.

Additionally, there will be a check performed to ensure that the overall gap group performance does not mask the performance of any particularly low-achieving subgroups through an analysis of whether any individual subgroup falls more than three standard deviations below the mean of all students. If so, the school is also identified as a Focus school. Finally, the state through its Delivery Model will report performance data for each individual subgroup and set AMOs at the school, district, and state level to provide additional focus on these groups.

4. Describe the state’s general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

The state has a robust process for school and district analysis and improvement planning to support improved performance. The state has proposed a diagnostic review process through which the school/district (in collaboration with parents, students, and members of the community) is able to analyze data and root causes and then prioritize these and map them to strategies and supports in an improvement plan. The state also

has an additional layer of support built in through review of school and district improvement plans at the SEA to assess weaknesses and levels of implementation. The goal for these plans is to provide individualized support and intervention based on school needs. The improvement plans will drive the actions of the school and district to drive improvements in instruction and student achievement.

Priority and Focus schools will receive access to on-the-ground Educational Recovery Specialists and Leaders to provide intensive professional development and coaching. These schools may implement extended learning time and will have access to Reward schools as demonstration sites for promising practices.

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

Kentucky plans to require Focus and Priority schools and districts to implement comprehensive improvement plans to foster school turnaround. Priority and Focus schools that are repeatedly identified must initially submit improvement plans to the SEA and subsequently must participate in improvement strategies from an accreditation process, accept the assignment of a mentor/partner, or accept ongoing resources from the SEA. These intensive interventions are designed to support more comprehensive school turnaround in schools that are chronically underperforming and have the largest achievement gaps.

The state also articulates strong capacity in supporting school turnaround in Priority schools. Through the Office of District 180 and associated regional centers, leaders and coaches are dispatched to work directly with staff in persistently low-performing schools. Through this office, the school receives targeted professional development, short-term data cycle monitoring, and access to an online planning tool through AdvancED.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

Kentucky describes plans to build school and district capacity to improve student achievement, particularly with regard to Priority schools through the support of the Office of District 180. The types of embedded support this office will provide include professional development, teacher and leader coaching, and data monitoring and analysis. Kentucky also plans to use the school and district improvement planning process with electronic monitoring and support tools to build capacity.

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

Kentucky is in the process of developing guidelines for its educator evaluation system. Over the past year, the state has worked collaboratively with stakeholders to develop teacher and leader effectiveness frameworks that provide a baseline for a strong statewide evaluation system. These frameworks measure educators across the domains of instruction, learning climate, leadership and professionalism, and student growth. The state is currently working to validate these frameworks and will then send them to the Kentucky Board of Education for adoption. This year, the state is working with a set of fifty pilot districts to implement the new frameworks and define an evaluation system that includes multiples measures including student growth, professional growth, artifacts, parent/student voice, teacher self-reflection, and potential third-party observations.

In addition to incorporating teacher effectiveness into school accountability ratings, Kentucky plans to link teacher and principal evaluation outcomes to preparation programs to support continuous improvement. The state's planned data system will also allow it to gather effectiveness data to inform efforts to enhance equitable distribution.

### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

Kentucky is working to decrease the time and burden on schools and districts in submitting improvement plans through use of an automated process through AdvancED. The state also notes the intent to better align state and federal data collection and institute a more comprehensive system for tracking resources and results of improvement plans.

## Summary of State ESEA Flexibility Request

### STATE: Massachusetts

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

In its request, Massachusetts presents a clear and comprehensive vision and strategy for advancing student achievement toward college and career-readiness for all students with a goal that the state's proficiency gap be reduced by half by 2017.

The request – in which the state will promote standards aligned with college and career-readiness, address performance gaps, require continuous improvement of schools and districts with targeted supports and interventions, and aggressively address low-performing schools – is largely based on the state's current reform efforts and its current state accountability system. For example, Massachusetts plans to build on its current work on educator evaluation systems that are based in part on student achievement (mandated in new state regulations), its current development of curriculum frameworks aligned with the CCSS, and its aggressive turnaround strategies for schools and districts (required by 2010 state legislation). Using these existing reforms as leverage, Massachusetts will set new annual targets for the state and each district, school, and subgroup to reduce proficiency and achievement gaps.

2. How does the state **define college and career-readiness**? [See Overview; full request]

Massachusetts defines college and career-readiness as being able to enter college without the need to take remedial coursework. In addition to its discussion of CCR standards in English language arts and math, the state notes the development and implementation of CCR standards for students with disabilities and English language learners, evincing the state's deliberate consideration and inclusion of all students in its requested framework. Massachusetts also describes its existing efforts to cultivate CCR students, including its introduction of the MassCore curriculum (in 2007), a recommended high school program of studies that requires a more rigorous and demanding course load as well as additional learning opportunities such as a senior

project and service- or work-based learning. The state also notes that in the future, it will consider additional accountability measures linked to college and career-readiness including success in entry-level, credit-bearing college courses.

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

Massachusetts's request acknowledges and embraces continuous evaluation and improvement as necessary components for its proposed system of school and district accountability, with state supports and interventions targeted toward the goal of college and career-readiness. The state will evaluate districts, schools, and student subgroups against annual measurement objectives on a variety of indicators, including student achievement and student growth for all students and for a high-needs student subgroup. In keeping with the state's recognition and value of continuous improvement, the state will grant partial credit on certain indicators where a school or district demonstrates significant progress. Depending on their performance rating, schools and districts will receive varying degrees of state intervention and oversight in an effort to ensure that all schools and districts commit to and demonstrate continuous improvement.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Massachusetts provides ample evidence of its capacity to implement its proposed policies within the given timelines. Its three state education agencies – the departments of Elementary and Secondary Education (DESE), Early Education and Care, and Higher Education – and the Executive Office of Education (established in 2008 to coordinate the departments' efforts) will enable the state to transition to college and career-ready standards as a birth-to-20 initiative. Inter-department collaboration is evidenced on several current initiatives including the development and maintenance of a streamlined P-20 data system to assist educators with identifying the students who are off track and tracking student progress throughout the educational career; an online college planning tool; an enhanced flow of data back to high schools about the college success of their graduates; and stronger preschool/K-12 alignment in curriculum, instruction, and assessment (if Massachusetts is awarded a RTTT Early Childhood grant, the agencies will collaborate to develop kindergarten readiness assessments aligned to the new state standards).

Massachusetts also will use its regional District and School Assistance Centers (DSACs) to support schools in the accountability process. A regional approach, DSACs assist schools



and districts with self-assessment and planning; offer opportunities to learn about and share effective practices; and train, model, and facilitate the use of SEA resources and tools. Each DSAC is led by a Regional Assistance Director, a recently retired superintendent.

Finally, as part of its state accountability work, DESE's accountability office has recently undertaken 27 comprehensive district reviews regarding systems and practices and will use the lessons learned through this process as guideposts for the activities proposed by the state in this request.

### **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

Massachusetts's request evinces substantial commitment to and a high-quality plan for transitioning to and implementing college and career-ready (CCR) standards and assessments. For a state that has led the nation on the National Assessment of Education Progress (NAEP) four years in a row, Massachusetts's request is strengthened by the state's preexisting standards and assessment framework, including its rigorous requirements for a minimum program of high school studies (recently amended to require four years of math for admission to the state's four-year colleges and universities, for example).

The state adopted the Common Core State Standards (CCSS) in 2010 and has added unique state standards for pre-kindergarten. In 2010-2011, the Department of Elementary and Secondary Education (DESE) developed instructional modules, in collaboration with professional development providers, to align coursework with the state's standards in English language arts (ELA) and math. In spring 2011, DESE launched a professional development initiative focused on the design of these model curriculum units as well as on performance assessments based on the new standards.

Beyond ELA and math, plans are underway to revise the state's other curriculum frameworks (science/engineering, history/social science, arts, comprehensive health, foreign languages). The state also is working to realign its English language proficiency standards, in part through a memorandum of understanding with the 27-state World-Class Instructional Design and Assessment (WIDA) consortium. In spring 2012, the state plans to begin providing professional development for teachers of English language learners (ELL) on the curriculum frameworks and the WIDA standards. Also, Massachusetts is assessing the learning and accommodation factors necessary so that students with disabilities will have the opportunity to meet and exceed the state's standards and will engage in an alignment project with other states and university

research centers through the alternate assessment consortium, the National Center and State Collaborative.

Massachusetts already has begun to transition its state assessment (MCAS) to reflect the new ELA and math standards. This school year, MCAS will include some items based on the new standards; in 2012-13, the majority of items will reflect the new standards; and in 2013-14, all items on the ELA and math assessments will be based on the new CCR standards. Additionally, DESE is developing curriculum-embedded performance assessments in ELA, math, science, and history/social studies, which will be piloted between 2012-13 and 2014-15.

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Massachusetts's request for a college- and career-ready system of accountability and supports goes beyond current No Child Left Behind (NCLB) requirements by requiring deeper analysis of the existing NCLB measures (student test scores and graduation rates), by establishing new measures for school and district accountability (incorporated in a Progress and Performance Index (PPI)), and by setting annual measurable objectives (AMOs) related to gap closure for each school. Through this accountability system, the state will identify schools and districts with large gaps in proficiency and achievement to differentiate interventions by accountability status.

The proposed PPI measures examine a school's progress on gap-closing, student performance at the Advanced and Warning/Failing levels, student growth, and graduation and dropout rates for high schools. Specifically, Massachusetts would examine schools against the following four indicators:

- Testing participation (require 95% participation on state assessment or ELL assessment)
- Student achievement, which includes:
  - Closing proficiency gaps in English language arts (ELA), math, and science,
  - Reducing the percentage of students in Warning or Failing categories on the ELA and math assessments, and
  - Increasing the percentage of students in the Advanced category on the ELA and math assessments
- Student growth
- For high schools, graduation and dropout rates

Data from the previous four years is incorporated into a school accountability determination, with the most recent year's data being weighed most heavily. Currently, the lowest performing 20% of schools in the state are designated as Level 3/Focus, and the lowest performing, slowest improving schools statewide (up to 4%) are designated as Level 4/Priority schools. As new assessment data becomes available, Massachusetts will identify additional Level 4/Priority schools to meet the requirement that Priority schools equal 5% of the state's Title I schools. Districts will be classified at the level of their lowest-performing school.

The methodology for calculating overall school and district annual measurable objectives is based on a model of continuous improvement in which all schools and districts are expected to cut in half their proficiency gaps by 2017. This means that lower-performing schools must demonstrate greater improvement under this accountability system. The state will assign credit in the PPI based on how close the district, school, or subgroup comes to meeting the AMOs in ELA, math, and science. Full credit will be given to those that meet the target, as well as to schools that have a Composite Performance Index (based on student performance in ELA, math, and science) that meets the 80<sup>th</sup> percentile or higher for the group when comparing statewide results.

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

Massachusetts incorporates student growth into its accountability system as one of the major measures in its school and district accountability system. Massachusetts plans to measure growth in English language arts (ELA) and math for grades 4-8 and grade 10. Indeed, Massachusetts has annually reported a measure of student growth on its statewide assessment (MCAS) since 2008. The state will assign credit, for accountability purposes, to schools and districts that meet one of the three targets for student growth:

- Attain a student growth percentile (SGP) (measuring how much student changed relative to other students statewide with similar scores in previous year) of at least 10 points over median student growth percentile (SGP) for relevant group,
- Increase group's median SGP by 15 points over previous school year, or
- Reduce percentage of non-proficient students by at least 10%

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

Massachusetts will continue to issue and report AMOs for students in the aggregate, low income students, students with disabilities, English language learners (ELL), and major racial and ethnic subgroups. For accountability purposes, however, the state will

address subgroup accountability through the creation of a non-duplicated "high-needs" student subgroup, composed of students who are low income, have a disability, or are ELL or former ELL. The state notes that using this "high-needs" subgroup will enable the state to hold nearly 200 more schools accountable for subgroup proficiency gaps because the subgroup will meet the minimum N-threshold of 40 students. Ultimately, schools (and districts) will be held accountable for the achievement and growth of two student groups: the aggregate student population and the high-needs student subgroup. Elsewhere, Massachusetts notes that it will work to identify discrete student groups to prioritize at schools needing state intervention.

4. Describe the state's general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

Massachusetts envisions a statewide system of supports and interventions that are differentiated and tailored to school (and district) needs, with the extent of necessary intervention correlated to the scope of a school's problems. Under the Massachusetts Tiered System of Support, districts that have only Level 1/On Track or Level 2/Off Track (only moderately off-track) schools will enjoy relative autonomy to select any needed interventions; districts with Level 3/Focus Schools must seek Department of Elementary and Secondary Education (DESE) approval for the interventions that are selected through consultation with a regional District and School Assistance Centers (DASC); and districts with Level 4/Priority Schools will receive high levels of engagement from DESE including a district liaison and accountability monitor. Finally, districts with Level 5 schools will be placed under a receiver who will oversee management.

Supports and interventions for schools and districts will be aligned to the state's *Conditions for School Effectiveness*. This document will serve as a blueprint for school design with schools and districts examined against each condition, such as the following: effective school leadership and principal's staffing authority; professional development and structures for teacher collaboration through school-based learning communities; tiered instruction and adequate learning time; social, emotional, and health needs of students; family-school relationships; strategic use of resources and adequate budget authority; aligned curriculum; and effective instruction.

Level 2/Off-track schools require relatively low state engagement and must perform an annual needs assessment. Level 3/Focus schools may implement more targeted interventions after consulting with a regional DASC and receiving state approval. A Level 4/Priority school must implement multiple interventions aligned to all 11 of the *Conditions for School Effectiveness* and must receive the Commissioner's approval of its redesign plan. The state no longer will mandate No Child Left Behind school choice and

supplemental education services as currently described; instead, supports and interventions may include other focuses, including expanded learning opportunities, including tutoring, for struggling students; teacher training; differentiated staffing models; social/emotional/health supports; and professional development related to productivity goals.

Massachusetts indicates that it has the capacity to provide schools and districts in need with supports and intervention. For example, following 2010 legislation, the state identified 35 schools as Level 4/Priority schools. These schools were provided with a state liaison and an accountability monitor and received targeted assistance from DESE. Results from 2011 MCAS show that two-thirds of these schools made substantial improvements in student achievement on both English language arts and math.

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

Massachusetts plans to address priority schools, generally utilizing the Department's turnaround principles and building on an existing state law mandate. Under 2010 state legislation (an Act Relative to the Achievement Gap), Massachusetts requires that if a school is placed in Level 4/Priority, the Department of Elementary and Secondary Education (DESE) must notify the district and the school to begin a process to involve the community in school turnaround, resulting in a redesign plan approved by the Commissioner. The district must solicit recommendations of a local stakeholder group (including representatives of the district school committee; school's administration and faculty; local social service, health, and child welfare agencies; local workforce development agencies; parents; community members) before creating the redesign plan. The redesign plan must address district capacity, provide a blueprint for school intervention, and set annual measurable goals. DESE must approve the plan and will provide an assistant liaison and an accountability monitor to the district, define exit criteria, and provide targeted assistance.

As noted above, the state identified 35 schools as Level 4/Priority schools in spring 2010. These schools were provided with a state liaison and an accountability monitor and received targeted assistance from DESE. Results from 2011 MCAS show that two-thirds of these schools made substantial improvement in student achievement on both English language arts and math.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

In its request, Massachusetts presents a comprehensive picture of how, through its accountability system, it will provide targeted supports and interventions to schools and

districts in an effort to build their capacity to improve student achievement. To guide this work, the state developed two tools – the *District Standards and Indicators* and the *Conditions for School Effectiveness* – which include an examination of district and school capacity. The district-facing tool includes standards on leadership and governance; oversight of human resources, professional development, curriculum, assessment, and student support; and financial and asset management. Likewise, the first condition listed in the school-facing tool is "effective district systems for school support and intervention." Indeed, Massachusetts expressly embraces the principle that the district is the entry point for the state's accountability and assistance work, rather than the school; the state views its role as building district capacity. As such, the state requires that districts with Priority Schools submit a redesign plan that includes a focus on district capacity to plan for, implement, and monitor school-level redesign efforts. The district must analyze district needs and challenges and describe its systems for planning, supporting, and monitoring implementation of the school redesign elements.

To assist districts with capacity-building, Massachusetts proposes to use assistance liaisons and accountability monitors, employ its District and School Assistance Centers (discussed above), and provide other targeted assistance via partner providers, tools, and resources. The state will also compare implementation of interventions across schools, including schools with comparable demographics, to identify and disseminate best practices.

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

In its request, Massachusetts describes its plan and current efforts to implement a system of educator evaluation based on student achievement. In 2011 regulations, Massachusetts formally adopted an educator evaluation system that requires annual evaluations. Educators are evaluated against two major elements – 1) a "professional practice" classification based on classroom observations, artifacts of instruction, the contribution to the professional culture, and student (for teacher) and teacher (for principal) feedback, and 2) the educator's impact on student learning.

An educator receives one of four ratings on the "professional practice" classification, and his or her impact on student growth is determined to be high, moderate, or low. The judgment on student growth is determined based on student growth on the state assessment and at least one district-wide measure of student achievement; where there is no statewide student growth measure, at least two district-wide measures of student achievement must be used. The state expects strong ratings on professional practice and at least a moderate



effect on student achievement. Where the rating on professional practice is less than Proficient, the educator is placed on a one-year improvement plan and then is subject to dismissal. A strong professional practice rating coupled with low impact on student achievement results in a one-year improvement plan that focuses on the discrepancy between the two judgments and requires the intervention of the evaluator's supervisor.

All Level 4/Priority schools and other early adopters (including schools with federal School Improvement Grants) are piloting the new evaluation system this year. In 2012-13, all districts participating in Race to the Top will implement the system, and the system will be implemented statewide in 2013-14.

By January 2012, the Department of Elementary and Secondary Education (DESE) will publish a model evaluation system and rubrics defining four levels of performance. Districts may adopt the model rubrics, adapt them to meet local needs, or propose alternatives for DESE review. DESE also is developing other supportive materials for districts including overviews of the educator evaluation regulations, components, and timelines; a website with frequently asked questions; and a number of PowerPoint presentations.

Additionally, the state is developing program approval regulations for teacher preparation programs to ensure that the programs produce educators with a deep understanding of the content contained in the state's new curriculum frameworks. DESE plans to align its professional standards for teacher licensure with the new standards and indicators for teacher evaluation, which are linked to the state's curriculum framework.

#### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

In its request, Massachusetts addresses the issue of and identifies a number of administrative/reporting burdens, and requests that the Department of Education waive them. First, it asserts that the state's three-year district improvement plans, annual action plans, and school improvement plans satisfy sections 1116(b) and (c) of the Elementary and Secondary Education Act (ESEA) such that the additional ESEA requirements lack value for school districts. Next, Massachusetts requests to use its Parent/Guardian Report for the purposes of ESEA section 1116(c), rather than creating a duplicative school report card for federal purposes. Third, Massachusetts requests a waiver of the requirements in ESEA sections 2141(a), (b), and (c) regarding highly qualified teacher improvement plans and associated restrictions with the use of Title II-A and Title I, Part A funds; the state observes that flexibility from these requirements will allow districts to focus fiscal and staff resources on the development and quality



implementation of the new educator evaluation and support system. Finally, the state requests to use 21st Century Community Learning Centers (21<sup>st</sup>CCLC) funds to support expanded learning time during the school day, in addition to activities during non-school hours or periods when school is not in session.

Massachusetts also requests greater flexibility in the use of Title I, Part A funds for district and school improvement/accountability purposes. For example, the state proposes to require districts to reserve up to 25% of their Title I, Part A funds on a sliding scale to address identified needs. The state will improve its own fiscal accountability processes to monitor the quality and efficiency of district improvement efforts. Also, the state proposes to make some Title I, Part A, Title II-A, and 21stCCLC funds contingent on a district match for reform initiatives including extended learning time; teacher training; differentiated staffing models; social/emotional/health supports; and professional development related to productivity goals.

## Summary of State ESEA Flexibility Request

### STATE: Minnesota

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

Minnesota provides a clear and comprehensive plan for advancing college and career-readiness. The state has done extensive work to develop strong college and career-ready standards and assessments, proposes a more rigorous accountability system with a strong focus on gap closure, and has taken initial steps to develop new, more robust educator evaluation systems. The state has very strong implementation plans for each element of its request, with a focus on building school and district capacity. Working to close achievement gaps, which are identified as a major challenge facing the state, is also an explicit focus.

2. How does the state **define college and career-readiness**? [See Overview; full request]

Minnesota does not explicitly provide a definition of college, career, and citizen-readiness other than through the metrics it defines in its accountability system. Minnesota's request also references a state law that requires state standards to be sufficiently rigorous to prepare students for success in college and the skilled workplace. The state also cites a specific goal of ensuring students are prepared for "advanced work and civic participation." (p. 54).

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

Minnesota specifically commits to a process of continuous improvement across numerous areas of its request. The state notes its intent to add additional longitudinal

course-taking and postsecondary data to school accountability reports as soon as that data is available. Additionally, the state has a specific five-year process for review and refinement of academic standards. Further, the state commits to updated educator evaluation models over time to reflect new knowledge within the state and across the country.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Minnesota has already undertaken extensive work to develop and implement college and career-ready standards and assessments and has developed extensive partnerships with institutions of higher education, regional cooperatives, external experts, and philanthropic organizations to support the implementation of its proposed accountability and educator evaluation systems. The state has identified an aggressive but feasible timeline for implementation and demonstrates significant capacity based on its work to date in implementing college and career-ready standards and assessments.

### **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]]

Minnesota has passed legislation requiring alignment of their standards with college and career-readiness. Reading standards were recently revised and aligned with Common Core State Standards (CCSS) and will be implemented in 2012-2013. New math standards were implemented in 2010-2011 and have been certified by state institutions of higher education to meet expectations for postsecondary readiness without need for remediation. Minnesota's math standards are also closely aligned with CCSS.

The state is participating in the World-Class Instructional Design and Assessment (WIDA) consortium and is conducting an alignment study to assess the extent to which WIDA English language proficiency standards align with Minnesota math and science standards. The results of this study will help inform state plans to make standards accessible to English language learners (ELLs) on the same schedule as other students. The state has also applied Universal Design for Learning (UDL) principles to guide the development of standards to ensure that they are accessible to students with disabilities.

Minnesota's implementation of revised standards is based on a three-stage process of informing, implementing, and aligning to best practices. Initial efforts have focused on raising awareness and have included outreach to key stakeholder groups, development of informational websites for educators and parents, and initial regional information sessions through the state's Education Service Cooperative Units (ECRUs). The next stage of implementation focuses on development of tools and resources, and professional development on how to use the standards. The final stage of implementation is centered on aligning to best practice and supporting full, effective implementation. This includes partnership with professional organizations, alignment with other state and district initiatives, and ongoing regional and online professional development.

The state is providing specific training on standards implementation to support ELL and special education teachers. To ensure that special educators are best able to meet student needs, the state is raising special education teacher preparation standards and has established a response-to-intervention community of practice to allow educators to share resources and work collaboratively to improve practice. Additionally, the state has developed professional development of standards-based IEPs to ensure that goals align to grade-level content standards. The state also provides training to ELL teachers on scaffolding content across different levels of language proficiency while maintaining high engagement.

While Minnesota districts have authority to choose instructional materials, the state is working to provide guidance on best practices and alignment of instructional materials. The state has developed a comprehensive birth-12 literacy plan implementation guide with a structure for aligning curriculum, instruction, and assessments across the spectrum. Also, the state has developed online math and science frameworks that provide curriculum planning and instructional materials aligned with new state standards. These tools also include detailed explanations of standards, instruction models, sample assessment items, and support for differentiation.

The state is working to both assess and expand its accelerated learning opportunities. It plans to develop a data system of dual credit programs to identify gaps and areas of need and provide more opportunities for low-income and minority students to participate in these and other accelerated programs. The state is also partnering with institutions of higher education to provide professional development for high school teachers and college faculty to expand access to these programs.

Minnesota also funds the Educational Planning and Assessment System (EPAS) for school districts and charters that choose to participate. This series of linked assessments

allows teachers and parents to determine college-readiness beginning in middle school. The state's P-20 Education Partnership has also created a task force that will develop a plan to encourage that middle and high school students take more rigorous courses to ensure that they are college and career-ready.

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Minnesota proposes to continue using its existing NCLB Adequate Yearly Progress (AYP) measures (participation, proficiency index, and attendance/graduation rate) to calculate AMOs but with a new target of decreasing the percent of students who are not proficient in each subgroup by half within six years to better address achievement gaps. Districts will only be evaluated on AMOs while schools will have an additional component calculated called Multiple Measurements Rating (MMR). The MMR combines two years of data on proficiency, individual student growth, growth gap reduction, and graduation rates.

Proficiency in the MMR is calculated using the state's approved index model that provides schools with points based on the percentage of measured subgroups that make AYP, with subgroups weighted by relative size. Individual student growth is calculated using a normative model of the difference between expected and observed growth. Growth gap reduction is measured based on the average of individual student growth in subgroups compared to individual student growth in higher-performing subgroups (i.e. free and reduced-lunch students are compared with non free and reduced-lunch students). Finally, the state calculates four-year graduation rates.

The MMR rating will be used to identify Reward, Focus, and Priority Schools. Reward schools will be the top 15% of Title I schools. Since the MMR includes both proficiency and growth, the state will not differentiate between high-progress and high-performing schools. Every three years, the state will identify the lowest 5% of Title I schools based on their MMR rating. Those with the lowest MMR as well as SIG schools will be included. Focus schools will also be identified every three years, but using a modified MMR rating. To determine Focus schools, the state will measure proficiency only of subgroups and not include all students. Then this measure will be combined with the growth gap reduction measure to calculate a Focus rating. This rating will be used to identify the bottom 10% of schools that have not already been identified as Priority schools. Additionally, the state will include Title I high schools with graduation rates of less than 60% (based on three-year averages of a six-year adjusted cohort rate).

State report cards will show AMOs and MMR ratings for schools and AMOs for districts. Additionally, the state is collecting new data in its longitudinal data system and plans to report rigorous course-taking and postsecondary enrollment in the future. The data will be housed in a new user-friendly website launching in December 2011 that will allow users to compare data across schools.

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

Minnesota's accountability system includes individual student growth both overall and among subgroups as a key factor in its MMR rating that determines school categorization. The state's growth model uses the difference between expected and observed growth of individual students as its growth calculation. The MMR also includes a measure of growth gap reduction, which is taken by comparing the average individual student growth in subgroups and comparing it to statewide averages in comparison to (higher-performing) subgroups. The state notes that growth data provides an important way to maximize the state's investment in assessment.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

Minnesota has a significant focus on subgroups in both AMOs and in the state's MMR system. Due to the large achievement gap the state faces, the accountability system was designed to have a particular focus on narrowing gaps. AMOs for each subgroup have a target of reducing the rate of non-proficient students in half within six years and subgroups that have further to go have more aggressive targets. Additionally, subgroups are included in the proficiency index of MMR and are the specific focus of the growth gap reduction measure.

4. Describe the state's general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

Minnesota plans to categorize a broader range of schools than required and provide a differentiated system of supports and interventions based on need. The state hopes to audit and subsequently highlight the best practices of Reward schools. This will facilitate replication of strong practices and will also help Reward schools identify key features that have driven their success. The state intends to develop an online

clearinghouse of information on Reward school best practice that would be accessible to all schools. The state is also seeking funding to partner Reward schools with lower-performing schools as an additional support.

If schools are identified as Focus schools, the school must perform a diagnostic review to determine the best interventions to meet the needs of students in underperforming subgroups. The Statewide System of Support (SSOS) will provide support through sharing of best practices and provisions of technical assistance to aid in determining appropriate targeted interventions. The school will have to submit an improvement plan based on these interventions for state approval. The state will encourage schools to incorporate culturally relevant and specific practices into intervention plans where appropriate. Schools with low graduation rates will be required to use a state-developed early warning system to identify and intervene to assist students at risk for dropping out.

In addition to the required categories of schools, Minnesota intends to identify Celebration schools and Continuous Improvement Schools. To be designated as a Celebration school, a school from the 60-85<sup>th</sup> percentile on MMR must apply to the state identifying reasons for recognition. This process will allow schools to examine best practices and identify areas for improvement. Additionally, the state will identify all Title I schools in the bottom 25% that are not already Priority or Focus schools. These schools must also complete a needs assessment and school improvement plan and will be eligible for technical assistance from the state. The state will audit 10% of the improvement plans of Continuous Improvement schools to monitor fidelity of implementation.

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

Minnesota has a comprehensive menu of supports and interventions for Priority schools. These include data analysis, goal-setting, professional learning communities, curriculum alignment, time audits, and professional development needs analysis. This array of supports will be designed and implemented with an SSOS facilitator.

Minnesota plans to develop diagnostic value-added profiles for Priority schools to help them identify root causes of poor performance, assess their needs, and monitor student achievement. These schools will be required to set aside 20% of their Title I school improvement funds to identify and implement interventions that have a record of success. These interventions will be developed as part of a comprehensive school improvement plan that also includes professional learning communities with intensive



job-embedded professional development. Priority schools will also implement extensive data monitoring systems and be required to submit regular formative data reports to both the district and state.

Priority schools will also conduct time audits to measure the amount of instructional time in place for core academic subjects and explore possibilities to increase instructional time. The state will also support priority schools through a curriculum audit to ensure that instruction is aligned with state standards and will recommend professional development on standards-alignment as needed. Further, Priority schools will be required to audit PK programming (if offered) and may choose to use school improvement funds to support PK if not offered.

As part of the school review process, factors impacting school safety and discipline will also be evaluated to determine if they are contributing to lost instructional time. Schools with poor engagement will receive resources and strategies from the SSOS to enhance their outreach and engagement.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

The state has numerous systems in place to build school and district capacity through regional and content-based networks that together form a Statewide System of Support (SSOS). For example, the state has a network of math and science teacher centers that have developed curricular frameworks and other tools to assist in standards implementation. Additionally, the state uses its regional ECSUs to provide training and support to districts in their area. The state has a specific focus on implementation throughout its request with detailed planning describing how it will implement these proposals to improve student achievement.

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

Minnesota has just recently begun development of a new educator evaluation system, but is building on the work of existing initiatives and stakeholder workgroups to help facilitate design and implementation. In 2011, the state passed legislation requiring the state education agency to develop a new system of education evaluation. In response,

the Commissioner of Education convened a Teacher Evaluation Work Group and a Principal Evaluation Work Group.

The Teacher Evaluation Work Group is charged with developing a system with frequent evaluation, focused on teaching and learning, differentiated by experience and expertise, and linked to professional development and employment decisions. The state will develop a default model that districts can implement as well as broad guidelines that LEAs which develop local systems must meet. The Principal Evaluation Work Group is charged with developing an evaluation model that will improve teaching and leading by shaping the school's professional environment and improving teacher performance and effectiveness.

This work builds off existing initiatives including the Minnesota Q-Comp program that provides job-embedded professional development, the Teacher Support Partnership to provide strong induction for new teachers, and the Teacher Performance Assessment which is being piloted by teacher preparation institutions to measure teaching candidates' ability to advance student achievement.

The teacher evaluation system will have some common elements across all teachers, but will be differentiated according to teachers' level of expertise. All teachers will be evaluated based on state teaching standards and all evaluations will be conducted by qualified and trained evaluators. Additionally, all evaluations will include longitudinal student outcome data. For probationary teachers, the state proposes requiring three formal observations with peers serving as mentors. For tenured teachers, the state recommends a three-year professional review cycle with peer evaluation in the years that summative evaluation does not occur.

The state has not yet developed all elements of the principal evaluation and is considering whether to also develop a multi-tiered evaluation for school leaders. Principal evaluation will include annual evaluation of the principal's instructional leadership, organizational management, and professional development. The evaluation will include observations and surveys.

#### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

In addition to the required assurance, Minnesota explicitly states its intent to reduce administrative burdens on LEAs to allow them to focus on continuous improvement of schools, but does not provide additional detail.

## Summary of State ESEA Flexibility Request

### STATE: New Jersey

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

New Jersey's request presents a clear and wide-ranging strategy for advancing college and career-readiness for all students. The state has comprehensively identified strategies to change the way the SEA provides support to schools and districts and has created a new set of Regional Achievement Centers (RACs) to provide more direct support. The state is focused on better utilizing resources to support Common Core State Standards (CCSS) implementation, identifying schools in need of intervention, and provide targeted supports that will dramatically increase performance.

The state has articulated an ambitious set of actions to raise the bar on college and career-readiness including design/adoption of a model curriculum, assessment, and intervention system; a data collection, reporting, and rating system on instructional resources; potential adoption of end-of-course exams; linkage of high school and post-secondary data; a system to track advanced coursework opportunities; linkage of student achievement data with teacher preparation programs, and a data system that will provide early warning and college and career reports based on numerous student indicators.

New Jersey's request includes a proposed state accountability system that clearly goes beyond NCLB in its rigor. It is still not fully defined and the metrics proposed are draft ones that will be finalized with stakeholder input by the end of the 2011-2012 school year. The system is also consistent with the CCSSO Accountability Principles. The boldest measures of the system are the inclusion of participation and performance in advanced coursework and the linkage to college enrollment and remediation. The state also proposes to develop several interesting reports to prospectively and retroactively

examine college and career-readiness. These include an early warning report for students in all grade levels, a college and career-readiness report based on high school transcripts and college placement tests, and successful post-secondary student profile to provide high schools with data on students who successfully completed post-secondary education. Other interesting aspects of planned reporting include financial data (to be determined), instructional time, and comparisons to peer schools in the state. These elements form a very comprehensive approach to improving college and career-readiness.

2. How does the state **define college and career-readiness**? [See Overview; full request]

New Jersey does not explicitly provide a definition of college, career, and citizen-readiness other than through the metrics it defines in its accountability system, which includes metrics of college enrollment and remediation in its proposed school performance indicators as well as participation and performance in AP coursework. New Jersey also addresses concerns about the large number of current high school graduates who require remediation in postsecondary education.

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

New Jersey describes a process of innovation, evaluation, and continuous improvement in designing and implementing the state's waiver request. Based on a recent survey of superintendents, the state learned that the SEA is not perceived as supporting districts in advancing student achievement. Consequently, the SEA is currently in the process of a significant restructuring that will align its work around four key areas: academics, talent, performance, and innovation. The SEA is also establishing a Delivery Unit to aid in performance management. Additionally, the Governor has appointed a Task Force that is reviewing state education laws and regulations to identify those that place unnecessary burden on educators.

Within the accountability system, the state proposes to incorporate continuous improvement through the use of the RACs to provide feedback to the SEA on state resources and implementation issues with respect to turnaround of priority schools. New Jersey also plans to pilot use of new school performance reports in spring 2012 to prepare for implementation in the 2012-2013 school year. Additionally, the state plans to monitor the effectiveness of turnaround interventions in priority schools using specific metrics that have been identified in advance. Finally, in educator evaluation, the state is currently implementing an 11-district pilot and will be piloting across the state in the 2012-2013 school year to refine its system.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

The state's request includes plans to implement numerous ambitious new initiatives within the next year. New Jersey has expressed a plan to reorganize the state education agency around this work and to boost capacity to support schools through the RACs, but there is an extensive amount of work (particularly in building data systems) and it is not entirely clear the state has the capacity to do this on the timeline it proposes. The state has already undertaken significant work in implementing CCSS and initiating the development of an educator evaluation system, but there is extensive work remaining to create the accountability system, define the metrics used, and ensure data systems are in place to collect all information required.

### **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

New Jersey has already begun work to implement CCSS and has a strong plan for supporting ongoing implementation. The state initially undertook an analysis of the alignment between current state standards and the new CCSS and determined that significant revision was required. Following feedback sessions with stakeholders, the state decided to develop or adopt a model curriculum, assessment, and intervention systems to help districts transition to implementation of CCSS. The state is also developing a series of in-person and online professional development sessions for teachers and principals to support implementation including specific strategies to meet the needs of English language learners (ELLs) and students with disabilities.

The state is putting a specific focus on principals and providing professional development on how to observe CCSS implementation in the classroom, how to collect and analyze assessment data to drive the work of teacher teams, and how to establish staff teams that drive continuous improvement of instruction. The state is also planning to collect data from schools and districts on the resources they are using so that they can share high quality materials across the state.

At the high school level, the state is developing data systems to track the availability of accelerated coursework and a new data system that will connect high school student achievement data and course-taking with post-secondary outcomes. The state is also considering adoption of end-of-course exams in place of the state high school exit exam.

To support this work, the state is going to utilize its newly created RACs to assist schools and districts, particularly those with the lowest performance and largest achievement gaps.

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

New Jersey selected the goal of closing half of its achievement gap within six years and calculated AMOs (called performance targets) for the state, districts, schools, and subgroups based on closing this gap in equal increments each year. The state has not finalized its metrics and has convened a stakeholder workgroup to finalize the measures and weights by June 2012. Draft performance reports contain measures across four categories: academic achievement, college and career-readiness, graduation and post-secondary enrollment, and closing achievement gaps. Specifically, the state has proposed within each element for high schools:

- 1) Academic Achievement: Proficiency in reading and math schoolwide and by subgroup and whether each group met their AMO. Also reported is the previous four years of overall proficiency data.
- 2) College and Career-Readiness: Percent of students taking SAT, percent of students scoring above 1550 composite on SAT, percent of students taking at least 1 AP exam, percent of students with scores of 3 or higher on AP exams, and percent of career and technical education (CTE) students passing an industry certification exam.
- 3) Graduation and Post-Secondary Enrollment: Total graduation rate, pass rate on state High School Proficiency Assessment (HSPA), remediation rate of students entering post-secondary education in New Jersey, and enrollment in post-secondary education within six or 18 months.
- 4) Closing Within School Gaps: Measured using the difference in score between students at the 25<sup>th</sup> and 75<sup>th</sup> percentile on state assessments of reading and math.

To identify Reward, Focus, and Priority schools, the state will use the criteria suggested by the U.S. Department of Education (USED) and averaged over a three-year period. To determine Reward schools, the state will consider schools that met AMOs for all students and subgroups, achieved an all-students proficiency rate of at least 90%, a graduation rate of at least 90%, and subgroup proficiency in the top 10% of the state. Other schools with high student growth percentiles (SGPs) will be recognized for high progress. Priority schools will include existing School Improvement Grant (SIG) schools, schools with the lowest overall proficiency rates (without high growth), and high schools with graduation rates below 75%. Focus schools will include other high schools with graduation rates below 75%, schools with the largest within-school gap between the



highest and lowest two performing subgroups, and the lowest proficiency rates of their two lowest-performing subgroups.

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

New Jersey articulates the intent to use SGPs in its school accountability metrics, but does not fully describe how these will be used. SGPs are included in determining which schools qualify for Reward, Priority, and Focus status. The state has determined that schools with SGP scores of 65 or higher (with a median of 50) are demonstrating high growth and will be designated as Reward-high progress schools. The state's request is not explicit about how SGP aligns with college and career-readiness.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

New Jersey plans to set AMOs for each subgroup within a school and measure and report progress toward that goal. Additionally, the state proposes a separate gap closure measure that is defined as the difference between the 25<sup>th</sup> and 75<sup>th</sup> percentile of students in reading and math. Schools with the largest differences as well as those with the overall lowest-performing subgroups (that are not experiencing high growth) will be identified as focus schools. A subgroup is defined as at least 30 students and representing at least 5% of the total school population. In making these determinations, the state plans to rank schools based on the combined performance of the school's two lowest-performing subgroups. The state's goal is to focus its resources to address equity based on pervasive deficiencies.

4. Describe the state's general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

New Jersey includes a comprehensive set of supports and interventions including diagnostic review for Priority and Focus schools. The state plans to make significant use of the RACs in providing support to Priority and Focus schools in particular. The RACs will help these schools develop individualized school improvement plans based on school needs. These plans must then be incorporated in the LEA's plan which must be approved by the state before the LEA receives Title I funds. It is not clear how supports or interventions for Focus schools will be specifically targeted to struggling subgroups.

The state proposes to use quality school reviews (QSRs) in Priority and Focus schools to evaluate the school climate and culture; leadership; standards, assessment and

intervention system; instruction; use of time; use of data; staffing; and family and community engagement. Districts will be required to provide most of the support to non-categorized schools including reviewing of data, monitoring progress, and identifying strategies to address performance gaps. The trainings and professional development sessions offered by the RACs to Focus and Priority schools will also be open to these non-categorized schools.

5. Describe how the state will address Priority schools utilizing the USED **turnaround principles**. [See 2D]

Supports offered by New Jersey to Priority schools through the RACs will include QSRs, model CCSS-aligned curriculum and assessments, professional development, data systems, guidelines for extended learning opportunities, and other innovative strategies. The state has further outlined a set of specific interventions within the eight categories that are reviewed in the QSR process. For each of these categories, the state has outlined specific metrics to assess the effectiveness of the interventions. Finally, the state notes that if schools require interventions targeted at more than four turnaround principles, the RAC team and school staff will prioritize the most urgent ones for the first year.

New Jersey's request specifically notes pending legislation to increase the number of charter authorizers, permit charter school conversions, and increase charter autonomy and accountability. One pending bill would encourage the development of new high-performing charters in the state's lowest-performing districts. Outside of this legislation, the state expresses a commitment to recruiting high-performing turnaround organizations to partner with struggling schools and charter operators to start new schools in districts with Priority schools. The SEA will give preference to charter proposals that seek to locate in these areas and serve students in overlapping grades of Priority schools to facilitate parent choice.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

The state expresses specific plans to build SEA, LEA, and school capacity. The SEA aims to improve its own capacity to provide support to districts through a comprehensive internal reorganization and a revised focus on performance management through establishment of a new Delivery Unit. Additionally, the state is hoping to significantly boost capacity in schools through the creation of the RACs with the ability to provide direct and embedded support to schools and districts including assistance with CCSS implementation, professional development, instructional improvement, and other supports. The quality of the RACs will be essential to successful implementation of New Jersey's ESEA Flexibility request.

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

New Jersey Governor Chris Christie appointed an Educator Effectiveness Task Force (EEFT) in October 2010 to develop educator evaluation guidelines to inform a new evaluation. The state is currently administering an 11-district pilot educator evaluation system in LEAs across the state and in SIG schools. Based on the data and feedback collected from this pilot, the state is hoping to do a statewide pilot next year (with at least one school in each district) and then scale up to full statewide implementation in 2013-2014.

The EEFT recommended an evaluation system in which 50% of ratings are based on student achievement (composed of multiple measures including individual student growth, schoolwide performance, and other measures) and 50% of ratings are based on professional practice (including classroom observations and other measures of practice). For principals, EEFT recommended 50% of ratings based on student achievement, 40% based on measures of effective practice, and 10% based on differential retention of effective teachers. Additionally, EEFT recommended four summative rating categories and use of the evaluation to inform professional development.

Further requirements for the pilot have also included training for teachers and evaluators, annual teacher evaluations with multiple observations, and use of professional teaching standards. For the statewide pilot, the state plans to additionally require three observations for non-tenured teachers, two observations for tenured teachers, and a minimum of one formal observation conducted by an evaluator who does not work at the teacher's school.

The state is planning to develop updated teaching standards in June 2012 and will require districts to use state-approved teacher practice frameworks that are aligned to these standards. The state is engaging with an Evaluation Pilot Advisory Committee (EPAC) regarding implementation during the pilot.

The state has a very ambitious timeline for implementing the rest of the work needed to scale educator evaluation statewide and attach consequences. First, the state is working on draft guidelines that they will release in January 2012. Subsequently, districts will need to build design and implementation costs into their budgets, select and contract with a teacher practice provider and performance management data system provider, conduct training for all evaluators and teachers, and continue to engage stakeholders to

be ready for the statewide pilot in 2012-13. Additionally, the state must develop guidance on measures for teachers in non-tested grades and subjects and complete work on data systems to link student performance with class rosters.

The state believes that it has regulatory authority to implement a new evaluation system, but is pushing for legislation to enforce use in tenure decisions, layoffs, hiring, and compensation systems. The state is also hoping to achieve mutual consent placements through this legislation.

#### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

New Jersey has a gubernatorial task force that is charged with examining education regulations and identifying those that place an unnecessary burden on educators. The task force's recommendations are due by the end of 2011 and will lead to a streamlined set of regulations focused on student learning.

## Summary of State ESEA Flexibility Request

### STATE: New Mexico

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

New Mexico's request is comprehensive and identifies a clear plan to increase college and career-readiness in the state. The state is in the planning stages of implementation of Common Core state standards (CCSS) and educator evaluation, but has articulated a clear timeline for implementation of those elements. The state has already passed legislation and is in process of implementing its new A-F school grading accountability system. Additionally, the state is seeking legislation to codify its proposed educator evaluation system.

New Mexico's request shows a high level of integration with clear connections across its proposed accountability and education evaluation systems. There is a consistent focus on improving instruction to ensure that all students are college and career-ready and the state provides strong evidence that it is significantly increasing expectations across all areas of the request.

2. How does the state **define college and career-readiness**? [See Overview; full request]

New Mexico's application speaks to a goal of ensuring that students are highly marketable and able to complete in the global economy, but does not expressly define college and career-readiness.

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

New Mexico's accountability system is predicated on a continuous improvement model to drive increased student achievement. The state requires schools to select and implement targeted interventions and then measure the impact of those interventions. Results are used to recalibrate plans as needed to ensure that interventions are highly effective. The state has also chosen to focus on the lowest quartile of students in each school in its accountability measures to incentivize all schools to continuously improve.

The state's work on its educator evaluation system is also driven by the goal of continuous improvement with actionable data and feedback that educators can use to improve instruction.

The state also expressly commits to providing Reward schools with autonomy to further innovate to advance student achievement and seeks to provide principals of Focus and Priority schools with additional flexibility in budget, staffing, and use of time in order to drive improvement.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

New Mexico intends to leverage several internal and external entities to boost its capacity to implement the proposed CCSS implementation, accountability system, and educator evaluation. The state received a planning grant from the W.K. Kellogg Foundation to support its CCSS implementation plan and has sought external support from the Southwest Comprehensive Center in designing its CCSS implementation plan, and designing a tool to evaluate the capacity of LEAs to drive school improvement.

The state has also restructured its state agency to include a Priority School Bureau to provide targeted onsite assistance to schools with the greatest needs. Further, the state plans to utilize its Regional Education Centers (RECs) to provide additional support in building internal school and district capacity.

### **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

New Mexico is currently in the planning stages for its transition to CCSS in 2014-15. The state has contracted for an alignment study to compare existing New Mexico standards with new CCSS. The state intends to use the results of this study to refine its planning and have a specific plan in place by the end of January 2012. This plan will include a specific timeline and budget, as well as plans for communication, professional development, curriculum and instruction, and evaluation of implementation. The state is receiving support from a planning grant from the W.K. Kellogg Foundation and has also established a Planning Committee and Framework Development Team of stakeholders to help advise on effective CCSS implementation. These teams include educators with experience in bilingual and Indian education to ensure that the plan will meet the needs of those subgroups.

The state has also administered a survey to districts to assess their needs in terms of implementation of new standards and assessments. This survey will also include an analysis of districts technical needs to administer the anticipated PARCC computer-based assessments.

Beginning in spring 2012, the state education agency will use conferences, websites, and other tools to raise awareness about the new standards. Professional development for K-3 teachers will occur in summer 2012 with implementation of the CCSS in those grades occurring in fall 2012. Grades 4-8 will follow in 2013, with grades 9-12 in 2014.

### **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

New Mexico passed state legislation in 2011 implementing a differentiated accountability system for schools based on A-F grading. The state is currently working on regulations for this law and intends to provide grades to schools at the end of the 2011-12 school year, with baseline grades released in December 2011. The state's system is based on the goals of being coherent, comprehensive, unbiased, and fair and creates a unitary system for evaluating all schools, calculating AMOs, and identifying categories of schools. The system relies on considerable research to create a consistent methodology across the accountability and educator evaluation systems in terms of their approach to measuring student achievement.



The state's proposed accountability system includes measures of status (proficiency and conditioned status based on a value-added model), conditioned growth based on value-added model (all students, 3 highest quartiles, and lowest quartile), attendance, opportunity to learn, and a bonus for student/parent engagement. High schools are also evaluated on 4-year and 5-year graduation rates and growth, and participation and success on college and career-ready measures including AP, ACT, PSAT, Dual Credit, and career preparation. Opportunity to learn is measured using a student survey (similar to those used in the MET study) which is used to help drive school improvement. Schools will receive separate grades for status and growth that will be averaged to determine the state's overall grade. (i.e. a school that receives an "A" in growth and a "C" in status would receive a "B" overall.)

The state specifically selected these measures to reduce the undue influence of student background characteristics in school grades and cites extensive research to support its decisions. The conditioned status and growth measures used are calculated using the difference between observed and expected outcomes to control for variations in student enrollment characteristics.

The state also specifically focused on ensuring the incentives were appropriate to motivate schools, educators, and students while avoiding unintended consequences. For example, the accountability system rewards schools for the percentage of students participating in college and career-ready activities but provides double points for success in those activities.

The state has developed AMOs (called School Growth Targets (SGTs)) that are benchmarked at the 90<sup>th</sup> percentile of current performance. This translates into a proficiency rate of approximately 75% with an additional 13% of students on track to being proficient within three years in math and all students being proficient or on track to proficiency in reading. For high schools, the 90<sup>th</sup> percentile would include a 4-year graduation rate of 92%, at attendance rate of 97.5%, 83% of students proficient or on track to proficient in 1 year in math, and all students proficient or on track to proficient in reading.

To calculate the SGT, New Mexico takes the difference in the 90<sup>th</sup> percentile target and the school's current performance across five areas (total school points, reading growth of top three quartiles, math growth of top three quartiles, reading growth of lowest quartile, math growth of lowest quartile) and divides by 10. The result defines the school's targets across these categories.

Reward schools will be defined as A/A (status/growth) ratings with consideration of schools in the A/B or B/A categories. The lowest 5% of schools will be designated Priority Schools (those with grades of F/F and a sufficient number of D/F or F/D schools to comprise 5%). At the high school level, the state will consider schools with the lowest graduation rates in this category as well. Focus schools will be those in the next decile above Priority schools and will generally encompass F/D and D/F schools. Focus and Priority schools have a two-year period for identification of entry to and exit from their categories.

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

New Mexico has a strong focus on student growth and schools will receive a separate grade to evaluate this component. Growth is calculated for all students, for the highest 3 quartiles, and for the lowest quartile using a conditioned (value-added) model. These growth measures are weighted as 50% of a school's overall score at the elementary and middle level. At the high school level, school growth is measured for the highest 3 quartiles and lowest quartile and weighted as 20% of a school's overall score. While the state is not able to assess individual growth at the high school level with current assessments, it notes an intent to add this as additional assessments become available.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

New Mexico chose to use the lowest quartile of students instead of specific demographic subgroups because that is the group that displays the largest performance gap and using traditional subgroups does not fully identify all schools with significant gaps. By choosing a quartile model, the state ensures that all schools are pushed towards continuous improvement and avoids the use of a deficit model that labels students as poor performers by their demographic characteristics. The state also maintains a focus on subgroup accountability that is used to identify appropriate interventions in Priority and Focus schools. If a subgroup is particularly low-performing, a school's selected interventions must be specifically targeted to improving performance among these students. Additionally, the state will publicly report results for all subgroups.

The state also explicitly focuses on the performance of the lowest quartile in its SGTs. Schools are evaluated on the reading and math growth of their lowest quartile as two specific components of the five SGTs.

4. Describe the state's general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

New Mexico has a detailed set of turnaround interventions that are required for Priority and focus Schools. Additionally, the state intends to leverage Reward schools as a model of reform by asking Reward school leaders to mentor leaders in lower achievement schools and help with replication of best practices.

In addition to Reward, Priority, and Focus schools, New Mexico plans to identify Strategic schools that are at risk for slipping down into the Priority or Focus category. These are schools that include a D on at least one measure for two years. The focus of support for these schools will be building their capacity to drive more effective instruction. Strategic schools will also be required to submit a school plan with aligned interventions to address the reasons for their low grades. The state will also review an LEA's budget to ensure that appropriate tools are being used to support proven strategies in Strategic schools.

New Mexico will hold LEAs accountable through the use of a Curriculum Audit Handbook which was developed in collaboration with the Southwest Comprehensive Center. This tool evaluates a districts control of programs, resource, and personnel and will be implemented in districts with significant numbers of Focus and Priority Schools.

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

Priority schools are required to work with their LEAs and the state education agency to develop a measurable intervention plan based on data that addresses all seven turnaround principles (Focus schools are required to select four of the turnaround principles). The state will also monitor implementation through approval of LEA budgets to ensure that funds spent in D and F schools are targeted towards proven programs and methods for increasing student achievement that align with student needs. As schools implement these interventions, the state will request data to support the selected interventions and will require schools to shift funding to tools that yield a better return on investment if performance does not improve. This will be part of a process of continuous improvement in which schools implement interventions and measure the impact of those interventions on an ongoing basis.

New principals at SIG schools receive significant flexibility to restructure time during and outside of the regular school day and have additional autonomy in budget and staffing.

The state is looking to expand these flexibilities to principals that agree to lead Priority or Focus schools.

Additionally, both Focus and Priority schools will undergo an instructional audit with state and district leaders in advance of site visits to examine systems to support teacher effectiveness. These schools will also be assigned a state support specialist to lead them through a self-evaluation process and provide technical assistance on research-based intervention strategies based on the results of these assessments.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

The state is working to build the capacity of schools and districts through technical assistance on-site visits, professional development, and research-based progress monitoring tools. Professional development provided includes training in leadership, use of data, and a school self-assessment tool. The state will provide on-site progress monitoring visits every 4-6 weeks to Priority and Focus schools in collaboration with district and school leadership teams. These teams will review current data, analyze how data is used to improve instruction, observe classrooms, and observe professional learning communities.

Additionally, state support specialists will facilitate coordination with Regional Education Centers (RECs) that will be working with the state to build school and district capacity.

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

New Mexico is still working to develop guidelines for a new educator evaluation system. In 2011, the Governor convened the New Mexico Effective Teaching Task Force to provide recommendations for teacher and leader evaluation. The task force recommended a differentiated evaluation system with student achievement as a critical component, as well as restructured compensation, recruitment, and retention policies to ensure that highly effective teachers and leaders serve high-need, low-income schools. The goal of the new evaluation system is to foster an environment of continuous improvement among teachers to increase student achievement.

The state intends to propose legislation in 2012 to move to a five-level rating system that links educator evaluation with professional development, employment decisions, and licensure. The legislation will include: multiple measures of student achievement, annual evaluations, aligned professional development, and a connection to personnel decisions. The state's strategy will be to rapidly develop a model for teachers in tested grades and subjects and a transitional model system for evaluating teachers in non-tested grades and subjects.

For teachers in tested areas, the state proposes an evaluation system based 50% on a value-added model using state tests, 25% based on observations, and 25% based on locally adopted (and state-approved) multiple measures. For teachers in non-tested areas, the state proposes evaluation based 25% on a school's A-F school grade, 25% based on observations, and 50% based on locally adopted (and state-approved) measures. This model will be used only until the state develops assessments in all areas by 2014. The state proposes principal evaluations based 50% on a school's A-F school grade, 25% on fidelity of teacher observations and evaluations, and 25% on other locally determined (and state-approved) measures.

The state further plans to define an evaluation system that includes at least 4 observations per year (including at least two by principals), use of a uniform statewide observation tool with state approved training, use of a matrix design to include qualitative and quantitative data in determining a summative rating, and an in-depth post-observation conference to provide teachers with actionable feedback.

The state notes that it plans to use outcomes of the evaluation to inform the match between teacher assignments and student and school needs.

#### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

Beyond the required assurance, New Mexico does not expressly address the issue of reducing administrative/reporting burdens.

## Summary of State ESEA Flexibility Request

### STATE: Oklahoma

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

Oklahoma's request demonstrates a comprehensive vision for achieving the state's goal of all students being college, career, and citizen-ready by 2020. The request describes numerous recent reforms to support enhanced standards, assessments, and accountability and articulates specific plans for building state, district, and school capacity.

Oklahoma raises the bar on college and career-readiness through a proposed bold new accountability system that includes a far greater number of measures than NCLB but retains the focus on disaggregation and public reporting. The state's proposed accountability system is well aligned with the CCSSO principles and has a particularly strong set of supports and interventions targeted to the needs of schools and districts.

2. How does the state **define college and career-readiness**? [See Overview; full request]

Oklahoma does not explicitly provide a definition of college, career, and citizen-readiness other than through the metrics it defines in its accountability system. The state's request also mentions the value of problem-solving, entrepreneurship, and engaged and informed citizens. The state has worked to increase rigor including through raising its high school graduation requirements as recommended by the American Diploma Project.

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement** toward designing and implementing college and career ready

systems of accountability and supports, as well as other relevant areas? [See Overview; 2A-Summary of Accountability System; full request]

Oklahoma has made an express commitment to transforming the way the state education agency operates in order to better support schools with Common Core State Standards (CCSS) implementation. The state has contracted with the U.S. Education Delivery Institute to support this transition. The state is also exploring best practices from other states to develop their A-F school grading system. The state demonstrates a history of raising standards over time and has legislation that mandates a formal review and revision of standards every six years. Additionally, the state has built in an ongoing evaluation into their educator evaluation system.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Oklahoma plans to utilize capacity from the newly created Regional Educators Advancing College, Career, and Citizen Readiness Higher (REAC3H) network of districts as a means of disseminating information, sharing best practices, providing training, etc. The state has also developed a Ways to Improve School Effectiveness (WISE) online planning tool that will provide assessment, planning, and monitoring tools to schools and districts. The state has convened a Teacher and Leader Effectiveness (TLE) Commission that is working to determine appropriate teacher and principal qualitative frameworks, identify specifications for a value-added model, and develop regulations for approval by the State Board. The state has already passed a significant amount of legislation that enables the use of evaluation to inform personnel decisions.

### **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

Oklahoma's request includes a strong plan to transition to college and career-ready standards that is already underway. The primary focus during the initial year of adoption (2010-2011) was building awareness among key stakeholders and helping educators understand how CCSS are different from existing state standards. During the current school year, the state has focus on providing technical support to districts including alignment studies and an online portal of resources. In 2012-13, the state will utilize the REAC3H network to provide support to other districts including training and professional development. The state is also developing CCSS toolkits and using a train-



the-trainer model to support districts. Additionally, the state intends to hire 60 REAC3H coaches to provide direct assistance with CCSS implementation at the district, school, and classroom level.

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Oklahoma proposes to use an A-F school grading system for all schools and districts. The grading system contains the following measures: (33%) student test scores on state standardized tests in reading, math, science, social studies and writing (including end-of-course tests in high school); (17%) on learning gains in reading and math; (17%) on the improvement of the lowest quartile of students in reading and math; and (33%) on whole school improvements.

The state has a large number of whole school indicators. At the high school level, these are: completion of state's college and career preparatory curriculum; graduation rate, parent and community engagement; school culture; performance and participation in AP/IB/industry certification; postsecondary readiness (measured with SAT or ACT); graduation rate of at-risk students; and the school's performance trend. At the elementary/middle level, the whole school indicators are: attendance; parent and community engagement; school culture, drop-out rate, and accelerated coursework.

Many of these measures go beyond what is required in NCLB and several are directly tied to college and career-readiness including AP/IB/industry certification, postsecondary readiness, and accelerated coursework. While the precise weighting of the school improvement measures is yet to be determined, with such a long list, there is a danger of key measures such as high school graduation rates receiving small weight in the overall accountability system.

These measures will be aggregated into a grade for each school/district but the criteria for each grade level have not yet been established. Additionally, schools will receive a + or – on their grade based on their performance in meeting AMOs and their teacher and leader effectiveness ratings. Schools that receive a grade of F will be identified as Priority schools and those that receive a grade of D+, D, or D- will be identified as Focus schools. Those that receive grades of A+ or A will be considered Reward schools.

AMOs will be based on each subgroup (and all students) across four categories: math performance and growth, reading performance and growth, participation, and school indicator (graduation or attendance depending on school level). A school may have up

to 40 AMOs depending on the number of subgroups (with minimum n-size of 25 students).

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

Oklahoma is considering how to operationalize measurement of growth in reading and math as part of its grading system. In assessing schools' progress toward AMOs, the state will award schools with one point for each student that moves up one proficiency level (in a 4-level scale), two points for each student that moves up two levels, and three points for each student who moves up three levels. This will then be averaged and converted to a standard score to make up the math and reading growth components of the AMO. This model does not appear to measure growth to standard.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

Oklahoma has several components of its accountability system that are focused on equity and disaggregation. First, the state has a focus on the lowest performing quartile of students for all schools, which the state anticipates includes many students who are in historically low-performing subgroups. At the high school level, there is also a focus on graduation rates of at-risk students. The state has established school-level AMOs for each subgroup with a minimum n-size of 25, so schools will also be held accountable for this separately.

4. Describe the state's general system of **supports and interventions** for all schools and those designated as Priority, Focus or Reward schools. How does the state incorporate deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

Oklahoma has a very comprehensive set of supports and interventions for schools and districts. For Priority schools, the SEA will make a determination of the LEA's capacity implement school turnaround using the principles articulated by USED. If the state determines that the LEA will not be able to facilitate improvement, the school will be turned over to a statewide school district called C3 that may be operated by an Educational Management Organization (EMO). During the time a school is under state control, the SEA will work to enhance the capacity of the LEA to allow for future return of the school to district authority. Priority schools use the WISE online planning tool based on the state's Nine Essential Elements for school improvement. This will guide the school through a self-assessment and planning process and provide for school, LEA,

and SEA monitoring. The school can also apply to use a portion of their 21<sup>st</sup> CCLC funds (if applicable) for extended learning time activities that meet state guidance.

Focus schools will use similar tools but will place an emphasis on improving performance of the subgroup(s) that are underperforming. Additionally, LEAs with Focus schools will be required to set aside Title I funds to provide school choice (minimum of 5%). All schools will use a school improvement planning process, and all schools that are in the bottom 25% but have not been identified as Priority or Focus schools will be designated as targeted intervention schools and must implement strategies from a menu of state options. The State Board will have the authority to review the budget expenditures of LEAs with these schools to ensure funds are being spent on appropriate intervention strategies. The state has plans for monitoring of Focus, Priority, and targeted intervention schools including targeted site visits, status reports, and online monitoring. Further, the state will form student support teams to conduct diagnostic reviews in all Priority schools and selected Focus schools to provide additional analysis and support to low-performing schools. Finally, the state will use Educational Leadership Coaches to assist Priority schools with feedback, support, and coaching through site visits.

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

Oklahoma plans to apply the USED turnaround principles in priority schools through staff performance reviews and replacement, increased autonomy, ongoing professional development, redesigned schedules, instructional alignment, data reviews, family and community engagement, and safety and discipline. The state will have responsibility for appointing leadership to operate schools in the C3 either directly or in partnership with an EMO. If schools fail to make progress, the state board can choose to close the school and transfer students to higher performing schools in the LEA, another LEA that does not have any Focus/Priority schools, or the C3. A school may exit the C3 district once the LEA demonstrates capacity to support school improvement, the state board agrees to relinquish control, the LEA demonstrates improvement in other schools, and parents of students agree by a majority vote to return the school to the LEA.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

Oklahoma has a very detailed and thoughtful plan for building capacity of schools and districts. This includes a focus on the SEA, LEAs, and schools. Specifically, the SEA is a participant in numerous multistate consortia and collaboratives including Chiefs for Change, Implementing Common Core Systems (ICCS), and the Partnership for

Assessment of Readiness for College and Careers (PARCC). Additionally, the SEA is conducting professional development and undergoing internal reorganization to be more supportive of schools.

To build capacity in districts and schools, the state has created a tiered model of supports with general, focused, and intensive supports provided to schools based on performance. General supports will include access to the WISE tool, curricular academies, and tools for curriculum analysis. Focused supports will include access to a resource toolkit from research in the state on effective practices. Intensive support will include student support teams, educational leadership coaching, and onsite data review.

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

Oklahoma's model of educator evaluation is still under development with many decisions yet to be made. The state has taken numerous actions to lay the foundation for design and implementation, however. The state convened a Teacher and Leader Evaluation (TLE) Commission which has defined five rating levels, and articulated a system with multiple measures of effectiveness (50% qualitative, 35% student academic growth, and 15% other academic measures). The Commission will soon determine which teacher and leader professional practice framework to adopt from among several existing models. The commission has also explored how to best measure student growth and has made preliminary recommendations for a value-added model.

The state has taken numerous steps to codify required use of the evaluation system in legislation including to inform incentive pay, career ladders, reduction in force, dismissal, and professional development. The State Board will adopt a statewide evaluation system (with limited room for district variation) by Dec. 15, 2011 with selected district piloting in 2012-2013 and full statewide implementation in 2013-14. This is a very ambitious timeline, but the state has already undertaken significant work in design of a model and definition of use.

### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

Oklahoma's plan does not explicitly address reducing burden beyond the required assurance.

## Summary of State ESEA Flexibility Request

### STATE: Tennessee

**Purpose:** The purpose of this document is to provide a summary of key aspects of state waiver requests made under the U.S. Department of Education's ESEA Flexibility initiative. This summary recognizes that states continue to work to refine and enhance these systems which will continue to evolve and improve over time.

**Introduction. This section summarizes some overarching issues important to the state's overall NCLB waiver request.**

1. What is the state's **clear vision and comprehensive integrated plan** to raise the bar on college and career-readiness? [See Overview; 2A-Summary of Accountability System; full request]

Overall, Tennessee presents a clear and comprehensive high-level vision. In its request, the state outlines plans to fully implement math and ELA standards in grades 3-12 by 2013-14 through an LEA-driven process, with the TDOE playing a support and monitoring role. The state proposes a new model of accountability that focuses on: transparency around student data through accountability report cards that disaggregate student data, absolute performance accountability that includes proficient/advanced targets as well as targets for annual reduction in gaps, and relative performance accountability identifying the state's lowest and highest performing schools. Beginning this school year, the state has already begun implementing new systems of educator evaluation based on student achievement.

2. How does the state **define college and career-readiness**? [See Overview; full request]

Tennessee defines college and career-readiness as the ability to succeed at the post-secondary level. Specifically, the state's goal is that "All students will have access to a rigorous curriculum that includes challenging subject matter, emphasizes depth rather than breadth of coverage, emphasizes critical thinking and problem solving, and promotes responsible citizenship and lifelong learning" (p. 17). This goal is explicitly focused on both knowledge and application of higher order skills. Additionally, the state request indicates its plans to provide educators with access to professional development materials and a crosswalk of current state standards against Common Core State Standards (CCSS) in order to highlight areas of higher order thinking. TDOE is

also working to gradually shift state assessment items to emphasize constructed responses that require higher order thinking skills.

3. How does the state's request articulate a commitment to **innovation, evaluation, and continuous improvement**? [See Overview; 2A-Summary of Accountability System; full request]

Tennessee is committed to evaluating implementation of new programs and initiatives and using feedback to continuously improve. To ensure this process of ongoing improvement, the request indicates the TDOE will establish a new office to oversee the implementation of CCSS and PARCC to monitor effectiveness at each stage of implementation, including teacher professional development, assessment development, access to technology, etc. The state's request also includes a comprehensive stakeholder engagement plan to provide ongoing feedback from the field on CCSS implementation and to ensure all stakeholders understand the benefits of CCSS. The state has also expressly committed to developing local innovation zones to provide an opportunity to foster new ideas to improve student achievement.

4. How does the state's request provide evidence to indicate the state has the **capacity to implement** its proposed policies within the given timelines? [See Overview; 2A-Summary of Accountability System; full request]

Tennessee demonstrates the capacity to implement its request through building off its existing RTTT initiatives. Tennessee's request outlines a reasonable timeline and plan for implementation and indicates its intention to align these reforms with current RTTT activities and funds at the state and district levels. The plan also includes a strong emphasis on district capacity.

### **Principle 1: Standards and Assessments**

1. Describe the state's plan for transitioning to and implementing **college and career-ready standards and assessments**. [See Section 1B]

The state's request outlines a high-quality plan for transitioning to and implementing CCR. The state's request includes a phased implementation plan for CCSS, which began in K-2 this school year. By 2013-14, the state will fully implement math and ELA standards in grades 3-12. The state will implement PARCC assessments in 2014-15.



The state has focused on analyzing the alignment of existing state standards with CCSS and providing professional development on identified areas of difference including a greater focus on non-fiction texts, spiraled math standards, and a greater focus on depth than breadth.

The state has been working to increase the rigor of its standards and in 2009-10 reset cut scores on end-of-course exams and state assessments in math, reading and language arts, and science for grades 3-8 to more closely align with NAEP. (The old proficient cut score closely aligned with a GPA of D-, while the new cut aligns with a B.) To prepare students and teachers for new PARCC assessments, the state is developing a comprehensive plan to drive a gradual transition to CCSS-aligned assessment formats. TDOE is working with Achieve and ETS to identify gaps and develop new CCSS-aligned test items, and over the next two years, state tests will shift from an emphasis on low-level multiple choice questions to constructed response items that require higher-order thinking skills. The state will begin field testing these new test items this school year.

In its request, the TDOE also indicates that it will provide support to districts in meeting the technological demands of PARCC and will also facilitate a process to establish statewide curriculum aligned to CCSS for teacher and principal training programs.

## **Principle 2: Differentiated Accountability and Supports**

1. Describe the **measures and metrics** the state proposes to use to make accountability determinations (including AMOs) to drive college and career-readiness. [See 2A and B]

Tennessee proposes an accountability system focusing on two types of measures: absolute proficiency for all students and achievement gap closure between groups of students. The state's request is somewhat unconventional in that it does not directly address proficiency measures for student subgroups; rather, it sets thresholds for improvement of subgroup achievement through gap closure measures. The request also includes an emphasis on transparency through accountability report cards that disaggregate student data.

Achievement targets will measure the increasing aggregate percentage of students who are proficient or advanced on state assessments (math and reading/language arts for 3<sup>rd</sup> and 7<sup>th</sup> grades, and aggregate measures for grades 3-8 in math and reading/language arts). Notably, the request focuses on school- and LEA-wide proficiency targets, indicating that subgroup level achievement targets are addressed through the achievement gap closure measures, which focus on a reduction of the percentage of students in key under-performing sub-groups (non-white students, economically

disadvantaged students, students with disabilities, and English Learners). TDOE will engage with LEAs to determine LEA targets with the following general targets in mind: approximately 3-5% annual growth for all students using LEA-specific 2010-11 baselines and 6% annual gap closure across subgroups. LEAs will similarly engage with schools to establish school level AMOs.

The request indicates that proficiency measures and gap closure measures are treated as two distinct categories of AMOs, and every LEA and school will be evaluated based on its “achieve” or “miss” on each. To “achieve” in the proficiency category, an LEA/school must achieve more targets than it misses. To “achieve” in the gap closure category, an LEA/school must: achieve more targets than it misses, not widen achievement gaps because achievement within the same subgroup declined in three or more areas, or not decline in subgroup achievement on half or more targets. The request indicates schools will receive grades of A, B, C, D, or F, but does not specify how performance levels align with these ratings.

2. To what extent is **student growth** included in the accountability system? How is it used to advance college and career-readiness? [See 2A and B]

Student growth is primarily focused on closure of achievement gaps over time. The state's request also includes provisions for safe harbor using the Tennessee Value-Added Assessment System (TVAAS), which aligns with the growth measurements used in educator evaluations. This is included to help protect against concerns of small districts of genuine differences in individual cohorts that could skew growth proficiency data.

3. How is the state including and advancing **subgroup accountability and closing achievement gaps**? [See 2A, B, and E]

The state's request focuses on school- and LEA-wide proficiency targets, indicating that subgroup level achievement targets are addressed through the achievement gap closure measures. Gap closure targets are based on reducing the percentage of students in key under-performing sub-groups (non-white students, economically disadvantaged students, students with disabilities, and English Learners). (See Principle 2, Question 1 above). Report cards will also provide public accountability through disaggregated performance data for all subgroups.

4. Describe the state's general system of **supports and interventions** for all schools and those designated as priority, focus or reward schools. How does the state incorporate

deeper analysis of school performance such as through diagnostic review? [See 2A, D, E, F, G]

Tennessee will provide support to all schools through nine regional service centers whose staff serve as liaisons between the TDOE and LEAs. These staff members provide support including data analysis, training on implementation of state initiatives, professional development, and diagnosis and interventions based on root cause analysis.

The state request articulates a clear plan for Priority that revolves around four interventions, all of which include diagnostic review:

- TDOE-run Achievement School District (ASD), which provides autonomy on funding, facilities, personnel, and procurement;
- LEA-run “innovation zone”, which affords similar autonomies to those provided to the ASD;
- One of four SIG turnaround models (as approved by TDOE); and,
- LEA-led school improvement planning processes, subject to direct ASD intervention in the absence of improved results.

The request indicates the state's intention to ensure the lowest 5% of all schools be served through one of the first three strategies by 2014-15.

Unlike Priority schools, Focus schools capture a broader set of schools (representing over 60 districts) with varied challenges (e.g., some Focus schools will have large socioeconomic gaps whereas others may have large English language learner gaps). Tennessee has designed its Focus interventions on a school-by-school basis, managed by the LEA. All LEAs will:

- Submit a LEA-wide plan for how the LEA will manage achievement gap closure initiatives at the LEA level and for every identified Focus school
- Have the opportunity to apply for a competitive grant. In order to be competitive a LEA must develop plans to take on some of the following initiatives:
  - Time on Task
  - Extended school day
  - Cultural competency education
  - Co-teaching opportunities
  - Family support/community services
  - Root cause analysis
  - Feeder patterns within LEA
  - Inter-school strategic staffing of school leaders and teachers
  - Intra-school strategic staffing of teachers

Notably, Tennessee has expanded the mandate to identify 5% and 10% of Title I schools, respectively for Priority and Focus, to identify 5% and 10% of All schools. Tennessee's decision to do this is based on their philosophy that all schools should be held accountable to the same standards.

5. Describe how the state will address priority schools utilizing the USED **turnaround principles**. [See 2D]

In its request, Tennessee indicates its plans to develop an Achievement School District (ASD), a newly created division within the TDOE, which, using RTTT and I3 funding, will take over persistently low-performing schools using two strategies: 1) convert the school into a charter school, or 2) replace the LEA and manage the daily operations of the school. Schools absorbed by ASD will be determined by low student growth outcomes and feeder pattern analysis. Additionally, because the ASD will only be able to serve approximately 35 priority schools by 2014-15, the request also indicates plans to develop LEA-directed innovation zones, which will receive federal and state funding ear-marked for priority schools and autonomy over critical factors such as finances, staffing, program, and staffing.

6. How will the state build **capacity of schools and districts** to improve student achievement? [See 2G]

Tennessee's request has a major focus on building capacity of LEAs to support improved student achievement. The state intends to decrease its reliance on external vendors and focus on building capacity within regional service centers to in turn build school and district capacity. These regional service centers will provide data analysis, technical assistance, and support for instruction of special populations (i.e. ELLs and students with disabilities). The state's request also includes a plan to develop LEA-directed innovation zones to serve a broader population of priority schools than those supported through the ASD.

### **Principle 3: Teacher and Principal Evaluation and Support**

1. Describe the state's plan for development of **guidelines** or, if the state is further along in development, the state's **plan and system for educator evaluation** and the extent to which it advances student achievement. [See 3 A and B]

The state is currently in the process of implementing a statewide system of educator evaluation that exceeds ESEA Flexibility requirements. The state began full implementation of its educator evaluation system at the beginning of the 2011-12

school year. The evaluation system is administered annually for all teachers and principals, uses four summative ratings categories, and weights measures of student achievement as 50% of the overall evaluation. After field testing multiple options, the state adopted the Teacher Advancement Project (TAP) as their statewide rubric for teacher observation and developed an internal leadership rubric of professional practice, which make up the other 50% of the evaluation. Over the summer of 2011, TDOE partnered with the National Institute for Excellence in Teaching to train evaluators, dispatched implementation coaches, recruited full-time regional consultants to provide on-the-ground support for implementation of the system state wide, and trained nine field service centers to further assist LEAs in implementing the evaluation.

TDOE has developed a robust data management system that allows evaluators to enter observation scores and comments, allows educators to track their observation reports, calculates summative ratings, and gives LEA leaders and TDOE real-time access to data that will help determine where additional implementation support is needed.

State law requires that evaluation outcomes drive tenure attainment and revocation, but only for teachers who were not tenured prior to July 2011. Although not detailed in its requirements, state regulations require district leaders to make evaluation outcomes a factor in professional development, retention, promotion, and dismissal.

#### **Principle 4: Administrative/Reporting Burden**

1. Beyond an assurance, each state is required to examine and **reduce as appropriate administrative/reporting burdens** on LEAs. While it is not clearly included in USED's waiver application, does the state's request address this issue? [See full request]

Tennessee does not expressly address this issue in its request aside from providing an assurance in this area.